

# OFFICIAL TRANSCRIPT OF PROCEEDINGS

50-293

Agency: U.S. Nuclear Regulatory Commission

Title: Pilgrim Task Force Public Hearing

Docket No.

91 JUN 17 P2:56

PUBLIC DOCUMENT ROOM

LOCATION: Plymouth, MA

DATE: Wednesday, June 12, 1991

PAGES: 1 148

ANN RILEY & ASSOCIATES, LTD.

1612 K St. N.W., Suite 300

Washington, D.C. 20006

(202) 293-3950

030043

9612030229 910612  
PDR ADOCK 05000293  
T PDR

0/1  
DPP2

NUCLEAR REGULATORY COMMISSION  
PILGRIM TASK FORCE  
PUBLIC HEARING

Wednesday, June 12, 1991

7:00 - 10:00 PM

Sheraton-Plymouth

180 Water Street

Plymouth, MA 02360

IN ATTENDANCE:

Bob Erickson, Chair

Aby Mohseni

Blair Spitzberg

Jack Dolan

Margaret Lawless

Joe Keller

Gail Good

Falk Kantor

Bob Trojanowski

Laura Deskins



## P R O C E E D I N G S

MR. EATON: For the benefit of you all who don't know me, I'm Ron Eaton. I'm the project manager for Pilgrim nuclear power station at headquarters down in Rockland, Maryland.

As most of you are aware, the purpose of this meeting is for an opportunity for the task force here to receive input from state, national and local officials relative to their draft report findings on issues of off-site emergency preparedness for Pilgrim nuclear power station, which was submitted to the public on May 28th, 1991.

I'd like to go over some of the administrative aspects of this public hearing, so that you're all aware of how it will be conducted. For the benefit of you who do not have copies of the public report, or did not get them from the local library, there are copies on the table outside along with copies of the press release.

This meeting is going to be transcribed by a court reporter. And a copy of that transcript will accompany the final report. Additionally, people who do not wish to speak to the panel, they may submit written material which will also be factored into the final report.

We will call for speakers that are local officials, state officials, national officials first; followed by the people that registered to speak with me.

1           For the benefit of those who did not register to  
2 speak with me who would like to speak tonight, if you could  
3 go and see Jane Fitzgibbons over in the corner there, now  
4 standing, up and register with her; she will then pass that  
5 list to the panel.

6           We ask that the speakers try to keep their comments  
7 on the issues to about five minutes so that everybody has an  
8 opportunity to be heard. When you begin to speak -- Or when  
9 you're called, rather, if you would come to the center  
10 microphones here, identify yourself and any organizations  
11 that you will be representing, so that the transcript will be  
12 full and correct, we'd appreciate that.

13           I'd like to remind you that the purpose of this  
14 meeting, again, is to receive comments on the draft report.  
15 And about 8:15 we'll have a 15 minute break and follow with  
16 additional time as needed.

17           Any media questions will be handled by Bob  
18 Erickson, who is the panel chairman after the meeting.  
19 Additionally, we have public information officers from the  
20 NRC, Diane Srenchy -- Would you please hold up your hand?  
21 And also, Ken Hart from FEMA, who will be available to answer  
22 non task force issues pertaining to the emergency planning  
23 process.

24           Now, I'd like to introduce Bob Erickson. He is the  
25 chairman of the panel and he will introduce his task force

1 and then we'll call for speakers.

2 MR. ERICKSON: Thank you, Ron. We're delighted to  
3 be here tonight. Thank you for the opportunity of returning  
4 to Plymouth where it all began. In this case, where it all  
5 began for us, as well.

6 The task force that's before you now was created as  
7 a result of a public meeting here in Plymouth in September of  
8 last year. The task force was formed to analyze and follow  
9 up on public comments that were received at that meeting.

10 Now I'm going to ask -- Can I be heard in the back?  
11 Ron, can you hear me well?

12 MR. EATON: [Indicates affirmative.]

13 MR. ERICKSON: Okay. We have worked as  
14 objectively and as thoroughly as we could on this project and  
15 we believe that we have done a thorough job. Two weeks ago,  
16 we published our draft report of findings and placed a  
17 hundred copies in the Plymouth public library; along with all  
18 the of the references that we used, a couple of hundred in  
19 number, so that all of the material that we worked with would  
20 be available to you citizens.

21 We sent copies of this to local officials, and to  
22 the state officials. We also placed copies for the  
23 convenience of citizens in the local libraries of the towns  
24 that I've seen listed, which include Kingston, Wareham,  
25 Plympton, Marshfield, Duxbury and Carver.

1           And more copies of our report are available here  
2 tonight and we would encourage you to take one if you would  
3 like, since we don't want to carry very many back with us on  
4 the airplane. We also have some abbreviated copies of our  
5 public announcement, which include some summaries of the task  
6 force findings and they may be even more convenient for some  
7 of you.

8           We found that emergency planning is a dynamic  
9 process; and that's not news to you, I'm sure. Volunteers  
10 come and go, procedures are refined, circumstances change,  
11 improvements are made, we the task force witnessed this kind  
12 of thing throughout our inquiry.

13           Nevertheless, by the day of our draft publication,  
14 May 28th, we found that some matters of off-site emergency  
15 preparedness at Pilgrim Station still warranted attention, we  
16 felt, certainly by the next scheduled exercise in December.

17           Those issues involved, as you have already seen I'm  
18 sure, matters of certain equipment for communications and its  
19 maintenance; training of persons involved in emergency  
20 response; the identification of persons with special needs;  
21 and coordination of plans and procedures between the state  
22 and local communities.

23           Now as I stated before, we the task force think  
24 we've done a thorough job in putting together our facts. But  
25 the purpose of this meeting is to now obtain your comments in

1 sort of a final way, to be able to make our report as  
2 up-to-date and as accurate as possible.

3 In preparing our final report, we will review your  
4 comments, looking for substantial and material differences  
5 from the findings in the draft task force report. And we  
6 will forward a record of this meeting, together with the  
7 written comments received, to the commission with our final  
8 report.

9 Now, before hearing from commenters, I'd like to  
10 introduce the members of the task force. And let me begin  
11 with, to my left, Jack Dolan, who is from the FEMA Boston  
12 office, Region I. That office arranged meetings with state  
13 and local officials and facilitated the work of the task  
14 force in every possible way and we're delighted to have Jack  
15 with us on panel today.

16 Around the curve to my right -- I hope you enjoy  
17 this serpentine table that we have today, it's something  
18 different. Around the curve to my right is Falk Kantor, who  
19 was the team leader for Field Team 1. And I'd like to ask  
20 Falk to please introduce his team members and the topics that  
21 they covered. Falk?

22 MR. KANTOR: Thank you, Bob. I am Falk Kantor. I  
23 am a member of the NRC's emergency planning staff, and I was  
24 the leader of Team No. 1. Assisting me was Bob Trojanowski,  
25 from our NRC Region II office in Atlanta to my right. And to

1 his right, Laura Deskins of FEMA.

2 My team addressed issues related to emergency  
3 planning in the towns of Plymouth, Marshfield, Carver,  
4 Kingston, as well as Gurnet-Saquish. We also were involved  
5 in obtaining a set of current plans and procedures for all  
6 the EPZ towns in the state. Thank you.

7 MR. ERICKSON: The field teams were three in  
8 number. Falk was the leader of the first team. The leader  
9 of our second team as Ed Podolack. Unfortunately, Ed's  
10 mother died on Monday and he could not been here.

11 I'm sorry, he was looking forward to revisiting  
12 with you folks, to close the loop on this fact-finding  
13 activity. But in Ed's absence, I'd like to ask Margaret  
14 Lawless from FEMA headquarters to introduce the rest of the  
15 members of that team and the topics that they covered.

16 BY MS. LAWLESS: Thanks, Bob. I'm Margaret  
17 Lawless, from FEMA in Washington. To my right is Joseph  
18 Keller, from the Idaho National Engineering Lab, a consultant  
19 to FEMA. And to his right is Gail Good, from NRC Region V in  
20 the San Francisco area.

21 The areas that our team covered included issues  
22 concerning the reception centers at Wellesley, Bridgewater  
23 and Taunton; also issues concerning the Duxbury plans; and  
24 general issues having to do with evacuation time estimates,  
25 public information materials, the emergency planning zone,



1 shelters, and the public information materials.

2 MR. ERICKSON: Thanks, Margaret. And our third  
3 field team was headed by Aby Mohseni, who is around the curve  
4 to the left. Aby, would you please introduce your team  
5 members and their topics?

6 MR. MOHSENI: Yes. Thank you, Bob. I'm Aby  
7 Mohseni, I was with Team No. 3. And to my right, Blair  
8 Spitzberg from NRC Region IV, and Steven Borth from FEMA  
9 Region I, who unfortunately could not be here tonight.

10 And the areas we covered included communications;  
11 direct torus vent system; persons with special needs;  
12 potassium iodide; public notification system; recovery and  
13 reentry; and transportation.

14 MR. ERICKSON: Thank you, Aby. Now, before we  
15 proceed with comments on the draft report, I'd like to  
16 acknowledge that although there are not members from the  
17 state legislature here, that Cary Cullen from the Mass. Joint  
18 Committee on Energy is in attendance at the meeting. He's  
19 right up here in the front row.

20 In terms of public officials, we are pleased to  
21 have with us this evening Mr. A. David Rodham, I hope. I  
22 didn't see Mr. Rodham, is he here? There he is, in the back.  
23 How do you do, sir?

24 He is the director of the Massachusetts Civil  
25 Defense Agency. And we thought, Mr. Rodham, if you didn't

1 mind, that we would give you the podium first. If you care  
2 to make comments on the draft report, sir, would you just  
3 come forward to any one of these microphones?

4 BY MR. RODHAM: I'm Mr. Rodham, Dave Rodham of  
5 the Mass. Civil Defense Agency and also is another member of  
6 the public safety staff, assistant secretary to public  
7 safety, Dale Jenkins, who's in the back, he just came in,  
8 too.

9 And I thank you for this opportunity, mostly to,  
10 not knock necessarily the draft -- we've made our comments in  
11 writing -- but more to meet the people that I have not met  
12 prior to this evening. I have only been office three  
13 months, I'm part of the new administration and have been  
14 director for three months, which is about halfway through the  
15 task force

16 Or you were halfway through your efforts before I  
17 hit the scene. I've enjoyed working with the task force,  
18 I've enjoyed working with FEMA, and I've enjoyed working with  
19 all the activists down in Plymouth as well as the utility.

20 And I think we'll solve a tremendous amount of the  
21 problems or issues that have been brought up and I pledge  
22 that our administration will be: 1] Open; 2nd] Willing to  
23 listen to anybody; and 3rd] We will get these problems solved  
24 and we'll get them solved in a timely basis.

25 I thank you again, Mr. Chairman, for this

1 opportunity to speak before you.

2 MR. ERICKSON: Thank you, Mr. Rodham.

3 Are there any other state officials or  
4 representatives who would wish to speak? If not, we would  
5 like to proceed with officials from the local towns. And  
6 we're pleased to have here this evening Alba Thompson,  
7 speaking for the Plymouth Board of Selectmen.

8 BY MS. THOMPSON: Thank you for this opportunity.  
9 Within the hour, state Senator Kirby called to extend to you  
10 and to his constituents his regrets that he was not able to  
11 be here tonight himself.

12 I shall be speaking for the entire Board of  
13 Selectmen of the town of Plymouth. Our civil defense  
14 director is with me, also, as is our fire chief.

15 I am speaking directly to your report. The town of  
16 Plymouth thanks you for your effort in the draft report. The  
17 method of reviewing disputed issues raised by the Nuclear  
18 Regulatory Commission public meeting held in Plymouth on  
19 September the 6th, 1990, is commendable.

20 For the first time in the 18 year history of our  
21 preparations for radiological emergency at the Pilgrim  
22 nuclear power station, we finally have a report based on  
23 information by a task force team working on-site with local  
24 officials responsible for the planning.

25 Our town had been disillusioned and discouraged by

1 the October and December, 1988 NRC hearings when restart of  
2 Pilgrim was premised on testimony of NRC staff that had never  
3 seen the town's current plans; or consulted with local  
4 officials; or held a public hearing on emergency planning in  
5 this area; or even visited our Plymouth emergency operation  
6 center.

7 The NRC Inspector General's report of July the  
8 26th, 1990, found much of their NRC staff work inaccurate and  
9 was, quote from your report, "critical of the staff's  
10 determination." Rightly so. We must be unequivocal about  
11 what all that means.

12 Plymouth and four other towns within the ten mile  
13 emergency preparation zone went into a period of restart of  
14 Pilgrim when emergency plans were not complete or approved by  
15 responsible local officials, state officials, or Federal  
16 Emergency Management Agency officials.

17 From December, 1988 onward, we were at risk and  
18 continue to be without important operational aspects of the  
19 radiological plans for many months. The criticality of that  
20 situation comes home clearly if we all acknowledge that key  
21 portions of our implementing procedures were incomplete or  
22 missing. Police, fire, schools, and hospital were all  
23 missing. That is at the time of the testimony of December  
24 the 9th, 1988 before the NRC.

25 Not a single EPZ community had school evacuation

1 plans that had been approved locally. Your statement, draft  
2 NUREG-1438, Page 2-2 is therefore immensely welcome. And I  
3 quote. "It was, and is, the task force's position that the  
4 final word on the status of the town plans and procedures, as  
5 well as copies of the plans and procedures themselves, could  
6 only be obtained from town officials." End of quote.

7 That was exactly what the town of Plymouth had  
8 maintained in the NRC hearing of December the 9th, 1988 and  
9 in our written critique of the October, 1988 NRC hearing to  
10 which we were not invited, but the owning utility was. It is  
11 incomprehensible that your sensible statement was not policy  
12 for the NRC in the past when it was evaluating the states of  
13 our emergency plans.

14 Your recommendations to the NRC should include that  
15 policy statement. You have the makings of a good report  
16 here. What you do not have is a consistent designation of  
17 who will monitor your findings to see that necessary action  
18 is actually taken. Neither do you always deal with the  
19 enforcement when regulations have not been met.

20 Your report is a beginning. If little happens  
21 thereafter, the report merely becomes expensive pieces of  
22 paper. We urge you to annotate both recommended monitoring  
23 and enforcement throughout your final report.

24 Please notice, you often refer to the point that no  
25 NRC or CFR regulations cover a particular issue. But perhaps

1 your recommendation should be that one ought to be brought  
2 into being. Because an issue may not have been previously  
3 considered does not mean there is no need to deal with the  
4 problem.

5 For example, Page 2-11, quote, "If it becomes  
6 necessary for emergency workers" -- and I put my own words in  
7 'and the general population' -- "to evacuate Plymouth Subarea  
8 3 which includes the police station, the central fire  
9 station, and the EOC." End quotes.

10 There is no regulatory requirement for an alternate  
11 EOC, emergency operation center, but shouldn't there be one  
12 when Plymouth could not operate without the communications  
13 net and equipment of these vital services? The establishment  
14 of a second or alternate headquarters and the redeployment of  
15 public safety equipment and personnel would be absolutely  
16 essential if Subarea 3 were to be evacuated.

17 Plymouth has previously posed this problem in clear  
18 terms to you. The present plans to remove officials to  
19 Massachusetts Civil Defense Area 2, about 30 miles away in  
20 Bridgewater will not work. As our police and fire chief have  
21 told you.

22 We can not conceive of removing selectmen and key  
23 personnel to a point that far away while the town is  
24 undergoing disaster conditions. Officials belong close to  
25 their stressed people as a demonstration of their concern and



1 the visible commitment to duty. An atmosphere of confidence  
2 must be maintained. The knowledge that officials are close  
3 by and available and at work is part of the calming effect.

4 A solution for Plymouth for a suitable alternative  
5 EOC must be found. We thoroughly agree with your statement  
6 in the report, and I quote, "The task force believes that  
7 BECo, Boston Edison Company, should continue to work with  
8 town officials to find an acceptable solution to the town's  
9 concern about possible evacuation from EPZ Subarea 3," end of  
10 quote on your Page 2-11.

11 Please note that in this regard NUREG-0654 does not  
12 differentiate between a host community that surrounds a  
13 nuclear plant and other towns, much farther removed but still  
14 in the EPZ. Obviously the needs of Plymouth are somewhat  
15 different from those of Marshfield or Carver or other EPZ  
16 communities.

17 We suggest your report point out these special  
18 considerations, including the establishment of an alternate  
19 EOC. As you know, the scenario of the NRC drill of October,  
20 1989 did indeed require the evacuation of Subarea 3.

21 Again, Plymouth not only surrounds the Pilgrim  
22 nuclear power station, it is entirely in the EPZ, all 103  
23 square miles, with a year round population of 45,000  
24 residents, a summer population rising to 65,000 residents,  
25 and with a transient tourist number of one million visitors

1 in a season stretching from April through November.

2 Our emergency planning and our needs must take  
3 these particular statistics into consideration. If current  
4 regulations on radiological emergency planning do not cover  
5 that unique set of conditions of a host community, they  
6 surely should. We request you reflect the needs of such a  
7 host community.

8 Another large issue for Plymouth is the status of  
9 the reception centers: Wellesley in an old D.P.W. garage,  
10 Bridgewater in an old college gymnasium, and Taunton in  
11 Taunton High School. Plymouth reported to the NRC in 1988  
12 that, in our estimation, neither Bridgewater nor Taunton were  
13 actually in a condition to operate. Wellesley Center at that  
14 time was not even in existence.

15 It is no comfort to repeat from your draft report,  
16 quote, "There was no reception center for people evacuating  
17 to the north of the Pilgrim station at the commission's  
18 restart decision in December, 1988." End of quote. That's  
19 Page 2-95.

20 Returning to the Bridgewater reception center in  
21 the Kelly gymnasium. In February, 1991, this year, you  
22 discovered communications, that is radio, problems, quote,  
23 "At a crisis." That's Page 2-101.

24 You discovered that the Bridgewater fire department  
25 would not participate in radiological training and that the

1 provisions of Planning Standard F NUREG-0654 and Criteria 1  
2 and 2, quote, "Regarding a primary means for notifying and  
3 mobilizing emergency response personnel are not met." End of  
4 that quote. That's February 1991, Page 2-105 and Page 2-106.

5 A general indictment by your task force is found on  
6 Page 2-109. Here is the quote. "All of these facts point to  
7 the conclusion that for some substantial period of time  
8 before . . . January 1991, the reception center was  
9 understaffed and could not have been set up and operated."  
10 End of quote.

11 Plymouth has some doubts that training Bridgewater  
12 college volunteers is a suitable substitute for the missing  
13 fire department personnel whose general firefighting training  
14 gives them an added dimension of effectiveness. At any rate,  
15 the capabilities of that reception center has never been  
16 demonstrated in an evaluated exercise. Page 2-108. It  
17 should have been required.

18 In 1988, the town of Plymouth rightly charged that  
19 the Taunton reception center, then on the grounds of what had  
20 been a hospital for the insane, was also not operational.  
21 Today the Taunton reception center, now in Taunton High  
22 School, like Bridgewater, faces the refusal of the Taunton  
23 fire department to train or retrain for reception center  
24 operations.

25 I believe that department went one step farther.

1 It said it would not, also, take part in the NRC drill. In  
2 addition, according to your observations of January the 14th,  
3 1991, quote, "The portable monitors were covered with dust  
4 and were not attached to an electric source." End of quote.

5 Meaning, of course, the batteries were not charged  
6 at all times. And quote from your report, "The wooden box"  
7 -- and this is an aside, storing the 15,000 gallon bladders,  
8 end of that aside -- "was open to the elements providing  
9 minimal protection." End of your quote on Page 2-111.

10 Other equipment and supplies had not been  
11 inventoried since October of 1989 and were stored, in your  
12 word "haphazardly". "The metal fitting," another quote "for  
13 the water bladder could not be located." End of quote on  
14 your Page 2-112.

15 In the face of these discrepancies, your task force  
16 nevertheless concluded that the reception center was capable  
17 of fulfilling its intended function. That's a far reach.

18 In the case of all three reception centers, the  
19 local fire departments have declined, as of this reading, to  
20 train or retrain for any reception center operations. Notice  
21 the three fire departments, all of them. The task force  
22 should really address the reasoning that lead to this common  
23 decision, since non-public safety volunteers are not likely  
24 to come to their task with the expertise of firefighters.

25 In 1988, the testimony and letters of the town of

1 Plymouth to the NRC indicated that it did not believe the  
2 Bridgewater and Taunton reception centers were operational.  
3 There remain many doubts even today after the task force  
4 encouraged a great many 1991 ameliorations.

5 We should like to point out that for years,  
6 certainly from before 1988 and until this year, 1991,  
7 notwithstanding erroneous testimony of NRC staff given to the  
8 Nuclear Regulatory Commission as late as December, 1988 that  
9 Wellesley and Bridgewater centers were not operational and  
10 Taunton was questionable for some of that time.

11 Fortunately for your task force, you did not deal  
12 with the history of these centers, which in the event of a  
13 severe accident at Pilgrim would receive the public in the  
14 plume exposure pathway for registration, for monitoring  
15 and decontamination. That history is a sorry one and it  
16 deserves at least a paragraph in your final report. The  
17 truth should never be a casualty of space. The truth is  
18 indeed a finding, and it would be well for the commissioners  
19 to recognize it and finally to admit it.

20 The identification of the special needs population  
21 and the measures to develop suitable strategies to protect  
22 such individuals remains a problem for Plymouth, which has  
23 about 750 known cases, including about 175 new additions.  
24 And we still have about a 150 to be contacted. The MCDA and  
25 the Boston Edison company report prepared by Chadwick, Martin



1 and Bailey which is in your report and listed as PT-46,  
2 Attachment 114 was flawed, since in your quote "It was  
3 conducted by the telephone without a telecommunications  
4 device for the deaf." Also, "Such surveys cannot reach the  
5 transient population or persons without a telephone." End of  
6 quote Page 2-115.

7 Originally the report overlooked several zip codes  
8 so that 4,000 post office box numbers were left out of the  
9 mailings. This included Plymouth's Manomet post office and  
10 the Long Pond post office.

11 Much work remains to be done on special needs and  
12 Plymouth will be unable to meet the verification responses by  
13 the finish date which you indicated in your report and that  
14 date is July the 1st, 1991. We do not expect to meet that  
15 date. We cannot meet that date.

16 The Saquish-Gurnet procedure is still being  
17 revised. I'm sure you'll hear more on that from some of the  
18 residents of that area. An interface with Duxbury  
19 authorities who would need to assist evacuees during the  
20 emergency are still needed.

21 The Plymouth Board of Selectmen, it has not yet  
22 received the revised implementing procedure, some of which is  
23 based indeed on some new facts, new times and so on, which  
24 you yourself discovered.

25 The matter of equipment given to the town by BECo



1 prior to the coming of BECo emergency operations officer  
2 Valley and the subsequent comprehensive grant agreement went  
3 into effect must be involved. Before Valley and after  
4 Valley, quite unlike our calendar of Jesus Christ, has no  
5 reference to the need for the equipment nor BECo's  
6 responsibility to maintain it.

7           Quote, "If this equipment is not maintained  
8 satisfactorily, communication failures could result."  
9 Therefore the task force finds quote, "The Planning Standard  
10 10 CFR 50.47B8 is not met until the issue involving  
11 maintenance of the portable radio for the police and the  
12 pagers for the fire department has been satisfactorily  
13 resolved." End of quote on Page 2-10. The town believes  
14 that the pre-Valley equipment and post-Valley equipment, all  
15 issued on the basis of need, should be maintained by BECo and  
16 BECo should be so informed. This maintenance of equipment is  
17 absolutely essential to a state of radiological emergency  
18 preparedness.

19           The town could not possibly meet the objectives of  
20 the NRC graded drill scheduled for December, 1991 and more  
21 importantly, for a real life emergency, without its equipment  
22 and preparedness status. See the summary of your findings,  
23 Page 1 through 6, particularly Findings 1 and 2.

24           The town still has many doubts arising out of the  
25 BECo transportation matrix, particularly letters of agreement

1 with bus providers, LOAs, signed and this is your quote from  
2 your report. "Without any indication of this person's  
3 position or title." End of quote, Page 2-130 and which were,  
4 quote, "Not clear, concise or consistent." End of quote,  
5 Page 2-131.

6 The statement a bus provider representatives that,  
7 quote, "They believed that all drivers would respond." End  
8 of quote, is debatable. Letters of agreement from trained  
9 bus drivers would be imminently preferable and we urge the  
10 task force to recommend this action. Two outside buses sent  
11 into Plymouth during the NRC drill of 1989 and used to  
12 demonstrate response was hardly a test. The exercise of  
13 December, 1991 must be strengthened in that record. In fact,  
14 neither the NRC exercises of 1985, 1989, nor the coming  
15 exercise of 1991 were scheduled during a summer month when  
16 population and traffic in Plymouth are at a peak. This is  
17 also true of all the other coastal towns, not only Plymouth  
18 but Kingston, Duxbury and Marshfield. All of them in the  
19 EPZ. It is too long to wait until 1993 to test a summer  
20 scenario; and we recommend FEMA and NRC be told that.

21 The summary of the findings of your draft report in  
22 Pages 1 through 6 are certainly helpful as partial guides to  
23 needed action. We recommend that additional specifics be  
24 added. Particularly the unique problems of a host community  
25 for a proper alternative EOC. The resolution of the refusal

1 of firefighters to staff reception centers is needed. The  
2 lack of readiness and the maintenance of equipment at  
3 reception centers requires attention.

4 Transportation needs an improved data base and  
5 procedures not just, quote, "Better coordination," end of  
6 quote among several agencies. A clear statement that the  
7 task force found local officials and local plans the best  
8 sources of valid information is needed as a finding, since it  
9 was that egregious oversight that caused inaccurate staff NRC  
10 reports in the past.

11 The fact that the task force uncovered much that  
12 was wrong in emergency preparedness and was the stimulus of  
13 immediate change should be noted. There is also no statement  
14 as to what agency, FEMA or NRC will have the future  
15 monitoring and enforcement functions in radiological  
16 emergency preparedness. In other portions of what I have  
17 just said there are recommendations, of course, for the  
18 strengthening of your findings.

19 Thank you for your patience through these many  
20 months of your review and particularly for this long  
21 presentation tonight by the town of Plymouth. We in  
22 Plymouth, America's hometown, are concerned for the public  
23 safety of our historic community and her citizens. Our  
24 intensity reflects our need to know you are listening and  
25 that you will respond. Thank you.

1 [Applause.]

2 MR. ERICKSON: Thank you, Alba. We appreciate very  
3 much the intensity and interest. And I'm certainly sure the  
4 task force will be examining these recommendations and the  
5 comments that you have made with very great care. As I  
6 pointed out, we will be examining these for, in this case,  
7 initially for the substantial and material aspects as they  
8 relate to our findings.

9 In this case, you used many our of our own findings  
10 to emphasize again to us what we have found and we appreciate  
11 that. I think there was one thing that you did raise that  
12 warrants a response, however, since we want there to be no  
13 question about the follow-on to this task force activity.

14 And that relates to what agency, or whom, who is  
15 going to be doing this kind of follow-up. I think it's  
16 important for us to comment on the fact that the -- Well,  
17 I'll leave headquarters Federal Emergency Management Agency  
18 person to speak to this, as we move from the task force now  
19 to the agency and perhaps Margaret Lawless can comment on  
20 that.

21 MS. LAWLESS: Surely. There are several places in  
22 the report that specifically mention that FEMA will be  
23 reviewing revised procedures or following on to further  
24 investigate or to provide technical assistance, but in  
25 general, it is also true that FEMA will be proceeding through

1 its plan review based on procedures that we've collected as a  
2 result of the task force effort.

3 And we do continue to provide technical assistance.  
4 Whenever it's requested, we stand ready to do that. Of  
5 course, in preparation for the December exercise, but at any  
6 time actually.

7 MR. ERICKSON: So I wanted to make that quite  
8 clear that the Federal Emergency Management Agency is going  
9 to be continuing what it is doing now, post-task force. When  
10 we fold our tent, that's just the beginning as you've  
11 indicated. FEMA will be carrying that torch through the  
12 process.

13 MS. THOMPSON: That raises another question in my  
14 mind which is corollary.

15 Does that mean that the NRC is not going to be  
16 concerning itself in emergency preparedness and that we're  
17 back to the original old loop when FEMA did that?

18 MR. ERICKSON: No, I would like to emphasize that  
19 both agencies have a keen interest in the protection of the  
20 public, certainly. The commission considers emergency  
21 preparedness to be an essential part of the totality of  
22 public protection measures. So certainly that is not true.

23 But FEMA and the NRC do have agreements in which  
24 they work together, in concert with FEMA emphasizing the  
25 off-site aspects and NRC emphasizing the on-site aspects and



1 working in collaboration for what falls in between. That's  
2 the way we would sort that out.

3 MS. THOMPSON: Thank you.

4 MR. ERICKSON: I think it would be appropriate at  
5 this point to ask Mr. Hadfield, who is the civil defense  
6 director from Plymouth, to ask if he would perhaps like to  
7 add some comments to Selectman Thompson's comments.

8 MR. HADFIELD: Thank you. I'm Douglas Hadfield,  
9 the civil defense director and I find myself in a very usual  
10 situation, following very eloquent Mrs. Thompson. I'm  
11 pleased that the task force finally got the information we've  
12 been trying to give the NRC correct.

13 Some of the issues have been observed by task force  
14 as needing attention ASAP. I do not agree with all of the  
15 statements in the report.

16 In the report, a number of instances, the task  
17 force says there are no NRC or FEMA requirements for this at  
18 this time. I would like to know if there will be any  
19 requirements in the foreseeable future; or are they just  
20 going to be ignored as issues?

21 You've already answered my next statement, of who  
22 will be responsible for the implementation of the task force  
23 recommendations. That will be FEMA.

24 The egress issue of the Saquish-Gurnet is an  
25 example of the no requirements. The problem is not going to



1 go away just because there is no requirement to fix it.

2 The special needs issue will never be complete.

3 While self-identification letters have been helpful in  
4 identifying people with special needs, the right of people  
5 not to respond is of great concern, to be able to have an  
6 accurate list. I respect their right not to respond, but it  
7 creates a very big volume of people that choose not to that  
8 really should be on our list of people that need assistance.

9 My concern about transportation available was also  
10 reflected in the draft task force report. The task force  
11 indicated it found inconsistencies and unsubstantiated  
12 numbers for buses that are assigned to areas. My main  
13 concern is still the availability of drivers. There are no  
14 LOAs with drivers and none are planned by the state. This is  
15 another example of the need for more requirements from the  
16 federal agencies.

17 Relocation for an alternate EOC is a large issue  
18 for Plymouth, as Mrs. Thompson has already explained.  
19 Bridgewater is just too far away. This was found to be a  
20 serious problem for Plymouth in the 1989 exercise and has not  
21 been resolved. Unlike the other EPZ towns, Plymouth has more  
22 than one subarea that may or may not be affected by a state  
23 directive. Plymouth has set an alternate EOC or mobile  
24 communications van is a solution to our problem. However, as  
25 I stated before, the alternate EOC cannot be as far away as

1     Bridgewater.

2             The status of reception centers is very clear in  
3     the task force report. On some of the issues, not much has  
4     changed since December of 1988. The availability of staff  
5     that has been trained is still at issue in both Taunton and  
6     Bridgewater. If the city of Taunton and the town of  
7     Bridgewater cannot get this issue resolved, whose  
8     responsibility is it to resolve it? The state or the federal  
9     government? This issue has to be resolved to give any  
10    credence to evacuation plans to all the towns in the EPZ.

11            I was pleased to see the task force report state  
12    that 10 CFR 50 was not met on the requirements of the pre and  
13    post Ron Valley issues. The equipment that is in question is  
14    very important to the responsibility of the emergency  
15    workers. Just because the equipment was given to the town  
16    before the agreements were signed does not mean it is not  
17    RERE, response related, and should be covered by the  
18    agreement. I hope the final report is a little stronger in  
19    stating there should be requirements for some of the  
20    findings.

21            We have waited a long time for a positive report  
22    that states the towns do know what they are talking about  
23    when it comes to emergency planning and are not just a group  
24    out to make headlines.

25            MR. ERICKSON:    Thank you, Mr. Hadfield. We are

1 receiving requests to speak from other officials now. I've  
2 just been handed a slip of paper that indicates that we have  
3 a representative from Bridgewater. And also from Kingston.  
4 Let's ask the gentleman from Bridgewater, Beasley, is he  
5 here?

6 Yes, sir. Would you please come forward and state  
7 your name and your position, sir?

8 MR. BEASLEY: Thank you very much. My name is  
9 Clyde Beasley. I'm a selectman from Kingston, actually. Not  
10 Bridgewater, although I do understand that if there is a  
11 problem, we will be for Bridgewater.

12 MR. ERICKSON: Oh, all I had to do was turn to the  
13 front of my report, look at our list of names and I would  
14 have gotten that right, instead of reading the slip of paper.  
15 Go ahead, Mr. Beasley.

16 MR. BEASLEY: Thank you. I wanted to, as those  
17 have done before me, thank you for your report, the draft  
18 report. It clearly shows many problems in the residence  
19 off-site emergency preparedness which must be addressed.

20 I'm glad to hear that you have assigned a follow-up  
21 mechanism. That was one of the first things I thought of;  
22 and I think that certainly naming FEMA and I think possibly  
23 delineating the process that would be followed; I think that  
24 would be very useful. As I read through this report --  
25 and I must admit I did not read it word by word, but I did

1 look through it -- it struck me that a lot of the issues were  
2 only addressed when you spoke to the various agencies and  
3 folks that were involved in this. It seemed a little bit to  
4 me like a teacher that gives a test and then goes and tells  
5 what the answers are so that the test will be passed by many  
6 of the groups.

7           And that particularly struck me with regards to  
8 Kingston. And I want to say that I'm going to speak  
9 particularly to Kingston in this, because that's of course  
10 what I'm most responsible for. I want to relate back to some  
11 of the earlier testimony that I gave and in my absence on one  
12 of the evenings that our premiere citizen Jean Creedon over  
13 here gave for me.

14           I think one of the first issues that we spoke to  
15 was the notification system, the siren system and I noticed  
16 that your draft report spoke to the Duxbury survey that was  
17 done in 1986 relative to our comments on this. I do not  
18 believe that Kingston problems were sufficiently  
19 addressed here vis-a-vis this issue of acoustical  
20 effectiveness, it's called, and I would like to see a survey  
21 done in Kingston, we'd like to see a look taken at exactly  
22 how effective those sirens in Kingston are and how well laid  
23 out they are.

24           It doesn't seem to me that, I know to others who  
25 commented on this issue in our town, that many of us can

1 really hear what's going on. And also, I again being  
2 relatively new to this -- I'm not going to be able to claim  
3 that for too much longer -- but having been a year involved  
4 in this business, the fact that people are --

5           These phones surveys that are done when people are  
6 notified that there's going to be a test, I would rather see  
7 there be some sort of a blind test on the system. Although I  
8 realize it's not too feasible to scare some peoples' trousers  
9 off in regards to that. But I think when people are aware  
10 there's going to be an alarm that they can probably hear it a  
11 little better than if they don't know, which would be  
12 relative to the actual situation.

13           Recently there was an unusual event, the Kingston  
14 Board of Selectmen was notified generally, through the  
15 grapevine, not actually through the formal process; that may  
16 be some problem down here. So I did, as the selectman, call  
17 our fire department dispatcher and discovered that the  
18 dispatcher did not know what was going on because there was  
19 no phone number to call for information.

20           I understand now that there has been a Boston  
21 Edison BECo phone number that's installed for information in  
22 the event of a situation like this. It struck me that it  
23 took more than 10 years to establish a phone number for fire  
24 departments to call to get this kind of information, which  
25 was slightly absurd, but I guess that's -- At least we now

1 have the phone number.

2 The second problem that my dispatcher had was that  
3 the fax machine that she had could not be read and she didn't  
4 know what was on the facsimile as it came through. I  
5 understand now that that's being taken care of, but again,  
6 this is one of those issues that seems to be sort of ex post  
7 facto thing and I would certainly, again, like to see it done  
8 prior to the actual situation.

9 Question I noted on here is "Does it take a  
10 potential emergency to make these improvements?" I think  
11 periodic testing of these elements would certainly be  
12 helpful. And it also struck me that the kind of thing that  
13 you're doing here should perhaps be done every six months,  
14 that this whole system would be tested like this. This would  
15 be very helpful.

16 We proposed that the Federal Emergency Management  
17 Agency, NRC, BECo, look into a possibility of using a  
18 different type of notification system which would be in the  
19 ringing of telephones in the area. I notice that, at least  
20 as near as I could tell in this report, that that issue was  
21 not addressed. I would like to know if that's a possibility,  
22 if it's something that could be looked at.

23 I think it's used in other situations; I'm told by  
24 folks who have worked for the phone company that this is very  
25 possible and I think it's something that, if we get beyond



1 this current situation, that it should be looked at very  
2 carefully.

3 Point 2 that we raised was that our understanding  
4 that the Bridgewater reception center is not add adequately  
5 repaired. It's clear that your draft report is in agreement  
6 with that. I did do a bit of reading on bladders and once I  
7 figured out what a bladder was, I realized the importance of  
8 such a thing.

9 That there was clearly problems with the bladders,  
10 that there was no way that these, the way it had been  
11 currently set up would work. And it was also my  
12 understanding that at the time that you spoke to the folks at  
13 Bridgewater, the bladders were not available. So I suppose  
14 until an emergency at the time that you spoke to them, we  
15 wouldn't have any way to deal with the waste from this.

16 The issue of potassium iodide and paper masks,  
17 again from a previous commentator I understand that there is  
18 no -- and from reading the report -- that there's no  
19 requirements for potassium iodide and paper masks be made  
20 available. It seems to me, from a common sense point of  
21 view, that they should be made available, that both of them  
22 are clearly critical in the situation.

23 I understand that the issue is one of evacuation,  
24 that you go for evacuation rather than any steps prior to  
25 that, but I think that if you were to look at making

1 available masks and potassium iodide to the general  
2 population, that that would be well worth while. I  
3 understand that's not a federal regulation, but I think  
4 federal regulations can always be changed.

5 Transportation. All I can say about the  
6 transportation, Item 6, that we have own our list of issues  
7 to be spoken to; that the transportation is clearly not what  
8 it was set up to be, that the issue of drivers being  
9 available -- never mind buses, but the drivers themselves  
10 being available -- was a very dicey proposition, that there  
11 are many problems with that. And I'm sure others will speak  
12 to the transportation issue.

13 Also, the special needs issue, that we have many  
14 folks who are not identified who -- This self identification  
15 business is very difficult to manage and that we clearly need  
16 to do more work on that. And I know there are people here  
17 who are going to speak to that issue as well.

18 We mentioned that the Jordan Hospital was not being  
19 able to handle the number of exposure victims. When the  
20 draft report spoke to that comment, it said that in fact  
21 Jordan Hospital was not, has no agreement to handle any  
22 victims, any exposure victims. I think there should be an  
23 agreement, I think that all the hospitals should be set up to  
24 deal with this. I can't think of anymore appropriate place  
25 than the hospitals and that's again something that although

1 no agreement exists, that we should definitely pursue.

2           The issue, again this was in Kingston, I didn't get  
3 much beyond Kingston relative to the issue of training.  
4 School employees and teachers need to be better trained. I  
5 do understand that, it's either 14 percent or 17 percent of  
6 the training that was to be made available to the teachers  
7 was only 14 to 17 percent in the town of Kingston was  
8 actually accomplished and I recognize that that is an  
9 internal Kingston problem, and that's something that I would  
10 tell you that the Board of Selectmen is going to get involved  
11 with.

12           I must say, also, that at the time the task force  
13 visited the towns, I believe you were around in February,  
14 that the Kingston board of Selectmen was not notified of your  
15 presence. Apparently, this might have been done through our  
16 CD people, and the board itself was not aware of this. I had  
17 the staff check back today and see if there was anything that  
18 we missed back in that time period and there was not. We  
19 would definitely like to be directly involved in all of these  
20 things as much as possible.

21           The issue of identification of shelters. Again in  
22 readings, the report is clear that your issue is one of  
23 evacuation rather than identifying shelters prior to the need  
24 to evacuated. I think, given the problems and difficulties  
25 that are clearly inherent to the transportation situation as

1 well as human nature involved in the transportation, that  
2 there should be a identification of shelters. The shelters  
3 should be identified by dose radiation, dose reduction  
4 analysis, not by square footage.

5 And the procedures should be developed in an  
6 appropriate facility so that we, as the Board of Selectmen in  
7 the town of Kingston, and I'm sure the other towns, have some  
8 fail safe back-up mechanism so that we know that the  
9 Independence Mall is the best, next best alternative to  
10 transportation and then the school is next and Burger King  
11 after that. Or whatever, whatever way it's going to go.

12 We discussed a little bit about our Board of  
13 Selectmen's training. As our new member came on this year,  
14 he received the same half hour to an hour of training that I  
15 did. Frankly, the training was entirely worthless. It would  
16 have helped us a great deal to have a more pragmatic training  
17 as far as, say going to Bridgewater, seeing the reception  
18 center, knowing what it looked like, knowing what to prepare  
19 people for. Knowing better what kinds of actions we can  
20 take and what kinds of things to expect.

21 I do not know, frankly, if the training that we  
22 received was an issue relative to the BECo person doing the  
23 training or whether it was something in the system. And  
24 again, that's something that this board will be checking on.

25 The final thing is that the implementing

1 procedures, the IPs, as they're referred to, have not been  
2 approved by the Board of Selectmen in Kingston Training is  
3 not being approved by the elementary school committee and I  
4 think until we get these issues straightened out and we  
5 certainly can use every resource that's available to do that,  
6 we will not be approving them.

7 My hope is that the follow-up that you spoke to  
8 relative to FEMA and the support that you've been and they'll  
9 be providing the communities will help us do that and get us  
10 to the point where we can come up with an approved acceptable  
11 emergency evacuation procedure.

12 I thank you for your work. Again, being somewhat  
13 new to this, it was refreshing finally to read something that  
14 was indeed presented a critical analysis of the situation and  
15 I, for one, appreciate that. Thank you.

16 [Applause.]

17 MR. ERICKSON: Thank you, Mr. Beasley. I  
18 understand that there is another selectman from Kingston who  
19 also wished to speak. Ron Maribett, is that correct?

20 MR. MARIBETT: Good evening, thank you very much.  
21 I really don't have very much to add to what Mr. Beasley  
22 said. We were not able, as we had planned, to rendezvous  
23 earlier to discuss our various points. As you know, I'm the  
24 newest selectman and I'm coming up to speed on a number of  
25 these issues.



1 I would only state that I had a conversation with  
2 someone at the statewide civil defense planning group in  
3 Framingham, I'm not even sure of the the acronyms right now,  
4 even at this point, with regard to the potassium issue.

5 And I was told that, well, in his opinion it will  
6 be better to let the parents equip their children with this  
7 and prepare them to deal with this. That's what he would do  
8 if it were his case, and he outlined some requirements that  
9 -- The fact is that there is no requirement and that there  
10 were all these reasons why they weren't, possibilities that  
11 someone might have a critical negative reaction to the drug,  
12 that there were liability issues and so on and so forth.

13 I just wanted you to take back this one notion  
14 about that. If we find ourselves in a situation where we  
15 have eight, ten, however many busloads of children on one or  
16 more roads; and one or more of those roads happens to become  
17 obstructed by any kind of a catastrophe that could happen  
18 while people are in a panic mode and the plume decides, for  
19 whatever reason, or moves in that direction; we can have a  
20 large number of supposed children.

21 I am in a position where you have to think of the  
22 greatest good for the greatest number. I would like to see  
23 some significant serious effort put into reviewing the use of  
24 the radiological drugs and do some significant public  
25 education on them so that we aren't leaving it up to parents;



1 some of whom know what to do; some of them may not.

2 So I'm very concerned about that and I'm very  
3 concerned about the treatment of the children once they're --  
4 I haven't seen this facility yet, I fully intend to at the  
5 earliest possible moment in Bridgewater, but I'm very  
6 concerned about the treatment of those children when we get  
7 there and particularly if they have been exposed and then  
8 they need to be stripped down and cleaned. I want very  
9 specific procedures on who is going to be doing that kind of  
10 thing. And I think I speak for a lot of parents.

11 Those are the two issues that I have, as I said,  
12 I'm coming up to speed, I intend to dedicate a significant  
13 amount of effort to this issue in the coming years.

14 And I thank you for your time and the opportunity  
15 to speak.

16 MR. ERICKSON: Thank you, Mr. Maribett. We've  
17 heard from several towns, there are still officials here from  
18 other towns who would like to speak. I understand that Mr.  
19 Tom Groux, the town manager from Duxbury is here. Mr. Groux?  
20 Would you like to come forward and make a comment, sir?

21 MR. GROUX: I thank you, Mr. Chairman. I'm  
22 speaking on behalf of the board of selectmen, but I must add  
23 that the selectmen have not met as a board to review the  
24 report, the draft report, since it's come in.

25 I have had an opportunity to look at it and I've

1 spoken to some of them, to all of them, but I do have a  
2 statement from the Chairman that I will be filing and I'd  
3 like to read briefly from.

4 "Dear Mr. Erickson: On behalf of the board of  
5 selectmen of the town of Duxbury, I wish to commend you and  
6 the task force for its thorough and comprehensive  
7 investigation into the off-site emergency evacuation planning  
8 for the Pilgrim nuclear power station. Your May 1, 1991  
9 draft report communication to the task force is committed to  
10 a full and objective assessment of the off-site emergency  
11 plans and procedures.

12 Our board of selectmen agency heads and Duxbury  
13 radiological emergency response plan advisory committee will  
14 be reviewing the draft in more detail in the coming days.  
15 And therefore we wish to submit additional comments beyond  
16 the comments we are submitting today. I think there may be  
17 some other people from Duxbury here tonight and they will  
18 also be speaking.

19 One special and overall comments we wish to make  
20 concerns transportation and bussing. Especially the  
21 evacuation of the school children. We believe this issue may  
22 be an issue common to all of the five towns in the EPZ.

23 It does not appear from the draft report that the  
24 task force has investigated sufficiently the weaknesses that  
25 we believe exist concerning the evacuation of school

1 children. We suggest that the recent FEMA review of Duxbury  
2 and Plymouth, I believe Plymouth was included in that review,  
3 of school implementing procedures be reviewed by the task  
4 force and that you consider incorporating that review into  
5 your final report.

6 The FEMA review, as I understand it, identified a  
7 number of issues such as the total number of vehicles  
8 actually needed and the number available, the types of  
9 vehicles needed, the identification of providers, and it  
10 identified these issues as needing further clarification. We  
11 believe that's probably appropriate for all the communities.

12 This matter has long been of concern to Duxbury but  
13 it is beyond the authority and the responsibility of the town  
14 to resolve this matter. The report does not seem to get  
15 specifically enough into that and does not recommend further  
16 steps to clarify those issues.

17 On some more specific issues concerning Duxbury,  
18 only, we will make the following comments -- By way  
19 clarification, I wanted to point out these are not the only  
20 ones and may well not be the most important ones as we have a  
21 chance to review the report in greater detail. The issue of  
22 equipment replacement and maintenance for pre-1988 equipment  
23 is identified and recognized as an issue, but the report does  
24 not point toward a solution. The town still considers this a  
25 responsibility of Boston Edison and we do not agree that the

1 cost should be absorbed by the town from its annual  
2 administrative grant. Now, this was spoken to earlier  
3 tonight by the CD director from Plymouth. We are really  
4 echoing those same comments.

5 The draft report states that four pagers with  
6 greater distance are needed. Those are for our selectmen and  
7 for our health agent. Actually, that's been cleared up and  
8 it is no longer an issue.

9 On the other hand our lifeguards on Duxbury beach  
10 need portable radios and that has not been corrected to date.  
11 The draft report indicates a majority of teachers said in a  
12 poll that they would not participate in the exercises or an  
13 evacuation. It would be more accurate to say if any comment  
14 is made on this point, that a small majority of teachers  
15 responded to a survey concerning participation.

16 In fact, I believe the union advised the union  
17 members not to respond to the survey. A large number of  
18 teachers have already received training in Duxbury and we  
19 have no reason to believe that the Duxbury teacher will not  
20 assist with evacuation if that should be necessary.

21 At a recent meeting with town officials you asked  
22 about our process for improving and correcting our plans and  
23 implementing procedures. We would comment on this very  
24 briefly by noting that in May of 1989, following the last  
25 exercises, the Board of Selectmen convened a special Saturday

1 workshop. At that time the board asked the exercise  
2 participants of the department heads, agency heads, and  
3 volunteers, to identify what they thought were weaknesses in  
4 our operation. The selectmen then developed a list of 18,  
5 what we call 18 self identified issues needing follow-up  
6 action.

7 Since that date, our civil defense director,  
8 working with the department heads has periodically updated  
9 this list, as well as the list on emergency planning. Now  
10 those reports are reviewed routinely, as shared with the  
11 towns RERP committee, department heads and the Board of  
12 Selectmen.

13 I might note that many of those issues are still  
14 unresolved and as representatives from other towns have said  
15 tonight, and we'll probably be saying, the Board of Selectmen  
16 in Duxbury have not approved any of our plans for final  
17 formal review. We're still working on them and we expect  
18 they will need correction and update in great detail. Chief  
19 O'Neill, our CD director, I believe has given the task force  
20 copies of the most recent updates of these two type of  
21 reports that I just referred to.

22 In summary, we wish to thank you for conducting  
23 this public hearing and again commend the task force for its  
24 work. As we complete our review of the draft report, we may  
25 send additional comments. The Board of Selectmen look

1 forward to receiving the final report at an early date and we  
2 would be specifically interested in knowing what specific  
3 recommendations you're going to be taking with regards to the  
4 issues that you address that are still outstanding. Thank  
5 you.

6 MR. ERICKSON: Thank you, Mr. Groux, I'm happy to  
7 accept those.

8 We have also with us this evening, who wishes to  
9 comment, Dan McGonagle, Marshfield civil defense director.  
10 Mr. McGonagle?

11 MR. MCGONAGLE: Thank you, Mr. Chairman. I  
12 appreciate the opportunity that you've provided me to speak.  
13 I'm going to make a comment on some issues that we have been  
14 affected, with our emergency response plan in the town of  
15 Marshfield.

16 First comment I'd like to discuss is on the report  
17 Page 2, Paragraph 4, discussing the pagers. In particular, I  
18 quote that "These pagers were made more than adequate to  
19 notify personnel slightly beyond the EPZ. But they had  
20 limited range." This is an incorrect statement. And I would  
21 like to bring that out this at this particular time.

22 Instead, the town of Marshfield firmly believes  
23 that effective and reviable communication is essential and  
24 the pager system is, in fact, inadequate and it has failed to  
25 meet the needs of our community.



1           My second point is on Page 2-46, Paragraph 2.  
2       Discusses BECos response to my written communications dated  
3       2/4 of '91. I'd like to quote, if I could. The report in  
4       brief, in part, states that BECo stated that the December  
5       7th, 1987 agreement was made with the understanding that  
6       these funds were to be used to pay the civil defense  
7       directors and salary and not to buy equipment.

8           In response to that, I'd like to quote from our  
9       grant, Page 2, Section 2. "Authorized use of grant funds.  
10      The parties hereto agree that the funds provided by the  
11      company to the town pursuant to this agreement shall be used  
12      exclusively for specific purposes of civil defense as defined  
13      in Massachusetts General Laws, Section L, Chapter 31 and in  
14      accordance with 10 CFR 50, Appendix E entitled 'Emergency  
15      Planning and Preparedness for Production in Utilization  
16      Facilities in Nuclear Reg 0654' for the express benefit and  
17      for the protection and health and the safety of the residents  
18      of the town in preparing for and in response to a radiologic  
19      emergency at Pilgrim Station or any other civil defense  
20      function.

21           "All that's required by the state and federal laws  
22      in regulation, the town may use these funds to retain the  
23      services of a consultant or similar contract personnel and  
24      other support personnel to assist in attempting to fulfill  
25      its responsibilities under this grant agreement. The company

1 will assist the town if the town if the town requests such  
2 assistance in preparing requests for proposals for any such  
3 consultant or contract personnel."

4 I'd like to point out in that quote, at no time  
5 have I mentioned anything about salaries.

6 Page 2-46, Paragraph 3. Radio for Harbormaster.  
7 I'd like to provide the board members with an update. Since  
8 the writing of this draft, several things have transpired.  
9 One of which has led to the delivery of two portable radios  
10 to our department for the purpose of the Harbormaster.  
11 However, other identified equipment are still pending.

12 Page 2-47, Paragraph 2. Fax machine. This problem  
13 has been resolved satisfactorily to our community. We  
14 appreciate that.

15 Page 2-47, Paragraph 3, school radios.  
16 Antennashave been installed, but as yet we have not received  
17 any radios as described in the end of the draft report.

18 On Page 2-47, Paragraph 5, EOC related issues.  
19 BECo states "The concern about the thermostat was a result of  
20 a misunderstanding of the operation." If this is correct,  
21 then I'd like to ask the question, "Why did it take a  
22 repairman two premise visits and several hundred dollars and  
23 a replacement of the existing piece of equipment to resolve  
24 the problem?"

25 Page 2-51, Paragraph 1, student transport issue.

1 Since this report was printed, many meetings have taken place  
2 between the state to resolve this issue. I'd like to report  
3 that a recent agreement has been reached between the state  
4 and now the town of the Marshfield and the state now  
5 completely supports the transferring of the Governor Winslow  
6 school students to the Furnace Brook facility, to which  
7 initially they were adamantly opposed.

8 This has been a major accomplishment and we  
9 continue to look forward to working with the state as we move  
10 forward with your planning process. In addition we, along  
11 with the NRC and FEMA, are looking forward to the state's  
12 approval for Marshfield's request to incorporate the entire  
13 community within the EPZ.

14 Lastly, I'd like to mention that recently I had  
15 received a telephone call in the afternoon from a radio  
16 station, asking me if I would comment regarding a recent  
17 press release that was conveyed to them that afternoon.  
18 Unfortunately I could not comment on it, I expressed that,  
19 because I was not privy to any of the information. And I  
20 would like to ask, if there is something like that's that's  
21 being shared, if possibly we could be on the same  
22 transmission, so we would receive it also. I would have been  
23 happy to comment, but unfortunately I couldn't.

24 Thank you very, very much.

25 MR. ERICKSON: Thank you, sir. I think I'd like

1 to comment and respond only to that last comment that you  
2 made. The task force did, I must assure you, try in every  
3 way to keep the local officials, state officials well  
4 informed of all that was going on. In the case of that press  
5 release, I think perhaps we did not get a press release to  
6 you thinking that this would be a general information for all  
7 the general public.

8 We did, however, have the draft report in your  
9 hands at that time, I hope. And essentially the press  
10 release parroted the executive summary of that report. So I  
11 hope that you still were well informed with the information  
12 that was necessary. I'm sorry that we didn't get the press  
13 release to you, though.

14 MR. MCGONAGLE: Very well, thank you.

15 MR. ERICKSON: We have now from the town of  
16 Carver, however you folks may pronounce that, I can't quite  
17 imitate it perfectly. I'm sure the lady from Carver will do  
18 it. Ms. Helen Copello, who is the assistant civil defense  
19 director from that town.

20 MS. COPELLO: Good evening, ladies and gentlemen.  
21 My name is Helen Copello and I am the Administrative  
22 Assistant/Deputy Director of Civil Defense for the town of  
23 Carver. I would like to thank the task force for a job well  
24 done in securing the information they have put together on  
25 issues of the off-site emergency preparedness.

1           The town of Carver had six issues that were of  
2 concern to us. They were fire department pagers, adequacy of  
3 communication with the alternate EOC, EWMDS, adequate space  
4 in the present EOC, transportation staging area, and the  
5 sixth one, the schools. This issue seems to be the issue  
6 with all towns involved with the nuclear power plant.

7           The first issue with the fire department pagers has  
8 been ongoing for about three years. Your findings show that  
9 they do not meet the code of federal regulations and we now  
10 hope to work with BECo to either purchase new pagers or place  
11 the present ones under a maintenance agreement.

12           Needless to say, our fire chief is very happy with  
13 your findings, since this has been a concern of his for the  
14 past few years because of an all volunteer fire department.

15           The second issue was with the alternate EOC, which  
16 is located at Area two in Bridgewater. We hope this will be  
17 resolved soon. I requested at our most recent meeting to  
18 have the state, BECo, town chiefs, and selectmen meet at Area  
19 2 and try and resolve the situation. We feel confident that  
20 this item will be taken care of.

21           The third issue concerning emergency workers  
22 monitoring decontamination station and has been resolved at  
23 this time. Plymouth is more than willing to help us out and  
24 the personnel that we have will be under their direction and  
25 the possibility of being able to add more manpower from the



1 Civil Air Patrol is looking favorable at this time.

2 Item 4 has to do with the space in the present EOC.  
3 This is beginning to become a big issue. The task force has  
4 found this facility to be adequate as an emergency response  
5 facility. The problem seems to be more with security of the  
6 police department than size of the EOC. The chief is  
7 responsible for any persons within the building, whether they  
8 are there for training, a meeting, a prisoner, et cetera.  
9 And this has become an impossible task to keep under control.

10 Even though the chief and myself work well with the  
11 everyday comings and goings, there is always the possibility  
12 of a time when my area cannot have the protection or security  
13 she feels necessary.

14 This becomes a definite issue at times of drills  
15 and exercises because of the amount of personnel that would  
16 be coming in and out of the EOC. We are talking upward of 40  
17 to 50 personnel in and out of the EOC. This place is  
18 adequate for a problem within the town, but certainly not an  
19 emergency at the plant.

20 The every day workings of the police department  
21 does not stop because of a drill or exercise or something  
22 going on at the plant. We feel that this issue should  
23 continue to be worked on and hopefully find a way to resolve  
24 this. The present chief and selectmen were not the team in  
25 place at the time of the agreement with BECo.



1           Item 5, regarding the transportation staging area  
2 has been resolved. The staging area is now located at the  
3 rear of the town hall and no longer at the elementary school.  
4 We have a chance to see how this works in December with the  
5 exercise.

6           The 6th and final issue are the schools. Our  
7 school department has taken issue with the same problem as  
8 all of the other EPZ towns, but seems to be satisfied with  
9 the findings of the task force at this time. I believe the  
10 only problem with this procedure was the fact that the school  
11 committee would like to see a full scale exercise with  
12 children being moved so that they know that even though they  
13 accept the procedure in concept, that they can see that it is  
14 implementable.

15           I would like to thank the NRC and FEMA for having  
16 this open meeting in order that we may continue to bring any  
17 concerns to you. Thank you.

18           MR. ERICKSON: Thank you very much, Helen. We  
19 have another local official with us tonight. William  
20 Ferioli, police chief from Bridgewater. Mr. Ferioli? Chief  
21 Ferioli? .

22           MR. FERIOLI: Thanks, Mr. Erickson. My name is  
23 Bill Ferioli, police chief in Bridgewater and I'm also the  
24 deputy civil defense director for the town of Bridgewater.  
25 Roger Walch was the fire chief in Bridgewater, is the

1 director of civil defense, we were both appointed about four  
2 weeks ago.

3 I have here a packet of information which I'd like  
4 to present to you. Unfortunately, it's addressed to Mr.  
5 Eaton. I'm going to read a portion of the cover letter from  
6 Mrs. Morwick, who is the chairwoman of the board of selectmen  
7 in Bridgewater and just mention briefly a few of our  
8 concerns.

9 "Dear Mr. Eaton, Please find enclosed concerns  
10 expressed by the town of Bridgewater through our public  
11 safety department regarding the inadequacy of the Pilgrim  
12 off-site emergency preparedness plan. Thank you for your  
13 attention to these concerns."

14 This particular letter does not have, does not in  
15 itself address all of the problems, but what Mrs. Morwick did  
16 was ask each of department heads that had concerns to prepare  
17 a letter, addressed to her, which is here and that, in total,  
18 will be presented to the commission.

19 Bridgewater was mentioned quite a few times  
20 tonight, a couple times in its lack of response by its fire  
21 department. And I will not speak for the fire chief, but I  
22 will address a portion of that and their refusal to  
23 participate in training. A portion of that was only partly  
24 true, because the same is in effect also for the police  
25 department. And I'd like to explain our reasons, or our

1     rationale for that decision.

2             For several years, both myself and the fire chief  
3     have raised concerns over a portion of the plan, lack of  
4     resources, and problems with equipment that we have in the  
5     town of Bridgewater. And over those years, those concerns  
6     went unheard or they were ignored. Quite often, the only way  
7     to get someone's attention when they ignore you is to hit  
8     them over the heads. So we decided to withdraw our support  
9     and/or our training to get someone's attention. And I guess  
10    a portion of this worked. Whether or not it follows through  
11    is another matter.

12            But a portion of that involved the fire  
13    department's communications equipment. It was a problem with  
14    the fire department's computer and its radios. When the  
15    computer was running, the fire department tried to transmit a  
16    message to its ambulance or to one of the fire trucks, there  
17    was a lot of static and it interfered with the message.  
18    There were a few other concerns which the fire chief has in  
19    his letter.

20            MR. ERICKSON: We captured these, to a large  
21    degree, in the draft report, did we not?

22            MR. FERIOLI: Yes, but they have not yet been  
23    resolved. In the police department, it involved equipment,  
24    pagers, and additional personnel that we had, a portion of  
25    which was addressed in the report, and that involved the

1 school crossing guards.

2 A part of the plan, the problem in prior years was  
3 that the police and fire chief were not involved in the  
4 preparedness of a portion of the plan that involved their  
5 departments. What would happen was, BECo would make a change  
6 in the plan, add other tasks for the departments, the police  
7 chief and fire chief were not informed of this until they  
8 happened to read in the draft and catch it themselves. When  
9 they inquired how the changes were made or where the  
10 resources were going to come from to take care of these new  
11 tasks that they were given, they weren't given any answer, so  
12 we even, in fact, refused to sign off on our portion of the  
13 plan that affected our individual departments.

14 One address that you made in here. We're a small  
15 department, roughly 30 men; and we have five part-time police  
16 officers and school crossing guards. For us, we have to  
17 depend on, to make this plan work, everybody we can get our  
18 hands on. We try to address that with pagers. When people  
19 are off duty, you can't get ahold of them. I might be out  
20 shopping, my officers may be sleeping, they may be out in the  
21 back yard. If you can't contact that person when you need  
22 them, he's no good to you.

23 We have people available right in the community,  
24 school crossing guards, additional tasks we picked up were  
25 the host schools. Without having enough policemen, we

1 thought it would be logical to fall back on the crossing  
2 guards who were already there, allow them to do the traffic  
3 right in front of the schools, which they were doing  
4 already, take care of it.

5 That was going to required some extra portable  
6 radios. We had some, but we didn't have enough. Not to get  
7 them out of the plume is mentioned in the report, but to  
8 contact them in case of a traffic problem, an accident, to  
9 find out what's going on there. Without communications to  
10 your people in the field, forget about it. They're out there  
11 and they're alone. You can't find out what's going on out  
12 there and they can't communicate to you problems that they're  
13 having.

14 So basically, our reports are here and also a  
15 report from the highway superintendent who had some concerns.  
16 And I'll ends it with that. And I thank you for it.

17 MR. ERICKSON: Thank you, Mr. Ferioli. Thank you,  
18 Chief Ferioli.

19 MR. FERIOLI: Call me Bill.

20 MR. ERICKSON: At this time are there any other  
21 local officials who wish to speak? I think that we have  
22 called all of the local officials.

23 MS. THOMPSON: We have our fire chief here.

24 MR. ERICKSON: Oh, very good. Yes, sir. The fire  
25 chief from the town of Plymouth.

1           VOICE: Chief don't from the Plymouth fire  
2 department. My main concern with the assessment of our  
3 relocation of headquarters fire station, should we have to  
4 evacuate Area 3. As we stated when the task force came  
5 around, it's of vital importance all the communications of  
6 the Plymouth fire department, as well as activation of the  
7 siren, formulate through that headquarters. Relocation to  
8 Bridgewater is not an answer to that problem. We need an  
9 alternates EOC or we need an EOC that is hardened so that we  
10 can stay in throughout an evacuation. Thank you.

11           MR. ERICKSON: Thank you, sir. Are there any  
12 other public officials who would wish to make a statement?  
13 If not, we'd like to proceed at this point maybe for a 15  
14 minute break and then we'll come back and get the comments of  
15 the citizens in general.

16           So, we can reconvene in 15 minutes.

17           [Break from 8:30 to 8:45 PM.]

18           MR. ERICKSON: The meeting is resumed. Those  
19 speakers who spoke before the break, it will be helpful if  
20 you are able to speak to the court reporter to confirm the  
21 spelling of your names. So if you have a moment later on,  
22 please do that.

23           Also, we're reminded that it would be very helpful  
24 if each speaker could state their name and their affiliation  
25 for the record as they commence their remarks. We do have a



1 number of speakers. I see Chief O'Neil back there, too. Did  
2 you care to speak, Chief?

3 CHIEF O'NEIL: No, thank you.

4 MR. ERICKSON: We don't want to miss any local  
5 authorities, officials. We are now going into the phase of  
6 comments by members of the public at large and also from  
7 citizen groups. I understand that we have about, perhaps ten  
8 such persons who wish to speak.

9 I think it would be very helpful if we try to keep  
10 those statements as brief as possible and we would encourage  
11 you to summarize your comments and just lay notes on us or  
12 give us your written statements, if possible.

13 Now, I understand that Jane Fleming is here and  
14 wishes to make a fairly long statement. Perhaps, Jane, if  
15 you wouldn't mind, we could hold you to close halfway through  
16 the remainder, so that you would have more time then, and we  
17 won't be pressing the clock.

18 MS. FLEMING: That would be fine. Out of respect  
19 to the other speakers, I'd be happy to wait my turn. But I  
20 will have my turn.

21 MR. ERICKSON: Jane, you've always had your turn.

22 MS. FLEMING: I certainly do, Bob.

23 MR. ERICKSON: Then I'd like to ask if Mary Ott is  
24 here, does Mary Ott wish to lead off the speakers? Mary Ott  
25 speaking, I presume, for Duxbury?

1 MS. OTT: Yes, thank you very much. Good to see  
2 you again, Mr. Erickson. We thank you for the opportunity to  
3 comment on the draft report prepared by the USNRC task force.

4 The findings on issues of off-site emergency  
5 preparedness for the Pilgrim nuclear power station represent  
6 a significant amount of time and resources by the NRC, FEMA  
7 and various state and local agencies and citizens engaged in  
8 this fact finding process. There is much truth in this  
9 report. It, in fact, confirms citizen's worst fears about  
10 the state of emergency planning and further validates the  
11 USNRC Inspector General's report of July 23rd, 1990.  
12 While there are positives to be acknowledged, there are areas  
13 of great concern. The task force executive summary states  
14 that factual information for this review is obtained  
15 primarily by the task force teams working with state and  
16 local officials responsible for emergency preparedness.  
17 However, on many occasions the task force has relied on  
18 information from the Boston Edison Company. The lessons  
19 learned from the Inspector General's report of July 23rd have  
20 demonstrated the folly of that process.

21 As stated by the Inspector General, "In light of 's  
22 vested interest in restarting Pilgrim, BECo was not the best  
23 source for the NRC staff to rely on for the status of  
24 off-site preparedness." To provide reasonable assurance that  
25 adequate protective measures can and will be taken in the

1 event of a radiological emergency, Section 5047 of 10 CFR  
2 establishes 16 standards to judge this adequacy. These  
3 standards establish procedures and systems designed to reduce  
4 the proximity to or time of exposure to radiation.

5 And I guess just for clarification for the record  
6 and those, one is assignment of responsibilities; two, the  
7 on-site emergency organization; three, emergency response  
8 support and resources; four, emergency classification  
9 systems; five, notification methods and procedures; six,  
10 emergency communications; seven, public education and  
11 information; eight, emergency communications; nine, accident  
12 assessment;

13 Ten, protective responses; eleven, radiological  
14 exposure control; twelve, medical and public health support;  
15 thirteen, recovery planning and post accident operations;  
16 fourteen, exercises and drills; fifteen, radiological  
17 emergency response training; and sixteen, development of  
18 periodic review and distribution of emergency plans.

19 Failure to meet the applicable standards set forth  
20 above may result in the Commission declining to issue an  
21 operating license. We remind that you that it has been five  
22 years since the Federal Emergency Management Agency withdrew  
23 its approval the Pilgrim plan, saying it was inadequate to  
24 protect the public health and safety.

25 We maintain that Pilgrim has operated in violation

1 of 10 CFR 50.47 since that time. Deficiencies in several  
2 areas of off-site emergency preparedness were acknowledged by  
3 the task force. Five of these areas were said to warrant  
4 attention before the next full participation exercise.

5 We feel that the following areas should also be  
6 added to that category: staffing of public education and  
7 information, medical and public health support, a resolution  
8 of the Gurnet-Saquish issue, monitoring facilities at  
9 relocation sites, sheltering for beachgoers, and the National  
10 Guard response issue.

11 We are shocked that the Commonwealth of  
12 Massachusetts has submitted an annual letter of certification  
13 mentioned in your report to FEMA, indicating that EPZ and  
14 reception community plans and implementing procedure  
15 revisions were completed in 1990.

16 While the task force has identified and elaborately  
17 analyzed many issues, we are concerned that in instances  
18 where a situation appears unresolvable, the forces made the  
19 general conclusion that the provisions and the current  
20 emergency plans provide acceptable flexibility. This  
21 terminology, like the standards for radiation protection at  
22 Pilgrim, quote "as low as reasonably achievable" do not  
23 inspire confidence in setting standards.

24 In closing, we want to go on record on behalf of  
25 the 1600 members of CURA stating that it is an outrage that

1 the NRC, without any opposition from the Commonwealth of  
2 Massachusetts, has permitted Boston Edison company to operate  
3 and completely defuel the Pilgrim reactor without emergency  
4 planning in place.

5 Since January, two unusual events have occurred,  
6 forcing the implementation of a plan we are discussing  
7 tonight. On March 29th a new fuel bundle was dropped in the  
8 spent fuel pool. We ask that you recommend that the NRC  
9 withdraw their finding of reasonable assurance for the  
10 Pilgrim Station and for the Pilgrim plant.

11 Thank you.

12 MR. ERICKSON: Thank you, Mary Ott.

13 Is Mary Lampert here?

14 MS. LAMPERT: I am Mary Lampert and I'm here  
15 tonight to speak for the Duxbury Nuclear Affairs Committee.

16 At the outset of this school year, the NRC came to  
17 a public meeting here in Plymouth. The subject was the, 1990  
18 report of the Inspector General. And that report made very  
19 clear that the NRC had failed emergency planning. It failed  
20 to correct known deficiencies that had been reported  
21 officially by FEMA in 1987. And most important, it failed a  
22 public trust by conducting an emergency planning assessment  
23 that was quote "Neither balanced nor thorough and by making  
24 Pilgrim's restart, rather than public safety, it's first  
25 priority."



1           This task force was formed in response to that IG  
2 report and for the last nine months, the task force has been  
3 going to school on the subjects that the NRC earlier failed  
4 so badly. The draft report is your final examination. In  
5 the jargon so often used in report cards, that exam shows  
6 that you applied yourself, worked hard and accomplished much  
7 that the NRC had failed the previous year.

8           It also shows, however, that there is still some  
9 areas that must be corrected to provide the reasonable  
10 assurance that is prerequisite to moving on to the next  
11 level. Perhaps more important, the report shows that in the  
12 critical areas of transportation, staffing of the Wellesley  
13 reception center, Gurnet-Saquish, providing for those with  
14 special needs, and the direct torus vent; and in a number of  
15 other other areas, also, the task force still relied too much  
16 on the information from the utility.

17           It also shows that the task force went out of its  
18 way to accept interim solutions or promises of future  
19 resolution from BECo, FEMA, or the state to avoid making the  
20 otherwise unavoidable final determination that specific  
21 deficiencies precluded reasonable assurance or precluded any  
22 concept of reality. Many of their remaining deficiencies  
23 have or will be discussed by others appearing here tonight.

24           In an effort to avoid repetition, I'll try not to  
25 reiterate problems discussed by others, but you should not

1 consider my silence as any indication that we as a committee  
2 do not feel these problems exist. The Nuclear Affairs  
3 Committee has reviewed all portions of the draft report that  
4 deal with Duxbury and concurs, for example, with Mrs.  
5 Fleming's factual analysis of the current status of planning  
6 for the Wellesley reception center, transportation, and the  
7 Duxbury schools.

8 In essence, we're signing off on what Jane has to  
9 say. But let me turn now to specifics, on which we have a  
10 number of comments. In addition, I am providing pages of  
11 your actual text of the draft report on which we have  
12 highlighted areas of particular concern and made specific  
13 marginal comments or suggestions.

14 Gurnet-Saquish. There were two very important  
15 issues not addressed at all by the task force. The first  
16 issue was sand on evacuation routes. The road connecting  
17 Saquish to Gurnet has very deep and soft sand and is  
18 frequently impassable and blocked by stuck vehicles. For  
19 example, over the recent Memorial Day weekend, 1991,  
20 somewhere in the neighborhood of 30 cars were stuck. This  
21 issue had been brought up the Gurnet-Saquish Association and  
22 David Quaid, both to the NRC and to BECo over the past many  
23 years.

24 This is an ongoing, continuous problem. Unlike the  
25 water problem which occurs on a regular but periodic basis.

1 The requests, the association had asked BECo to build up this  
2 road, the request had not be honored and the problem, which  
3 is the point, remains. The result is that there is no  
4 reasonable assurance for evacuation along this only motor  
5 route.

6 The second issue on the subject of Gurnet-Saquish  
7 that you failed to address is, who has authority to maintain  
8 the egress routes for Gurnet-Saquish and Duxbury beach?  
9 Presently, June 12, 1991, one can do any maintenance work  
10 whatsoever on the roads or the beach. Due to a legal hassle,  
11 a stay has been ordered by the courts and all work has  
12 stopped until the issue is resolved.

13 As a result, for example, the first cutover to the  
14 front beach from the bay side back road is virtually  
15 impassable. By their very nature, these sand routes require  
16 frequent and regular maintenance. What would happen to beach  
17 goers? This lack of maintenance issue affects the only  
18 egress route servicing, on summer weekends, over 5,000  
19 people. It must be resolved, again, before reasonable  
20 assurance can be assured.

21 Additional comments on Gurnet-Saquish, Page 2-74,  
22 the first full paragraph, probably ranks, I think, is the all  
23 time low in the history of this task force. To dismiss the  
24 admitted fact that the egress routes on Saquish neck are  
25 often impassable on the pretext that, quote, "The NRC's

1 emergency planning regulations do not specify a minimum time  
2 by which an evacuation must be completed" is an insult to the  
3 intelligence of any rational member of this community.

4 A nuclear accident will not wait for low tide or  
5 for a hurricane to blow offshore. When the roads are  
6 impassable, it isn't a question of when will an evacuation be  
7 completed. The evacuation won't even start. But this  
8 paragraph in your draft report gets even worse. The text  
9 goes on to say, quote, "Emergency plans are flexible enough  
10 to accommodate possible delays." And that "Although the  
11 actual amount of flexibility is difficult to establish and  
12 cannot be quantified," whatever that's supposed to mean, "the  
13 emergency plans and procedures include practical and feasible  
14 measures to account for expected natural conditions."

15 What are these practical and feasible measures?  
16 The report lists warning sirens; radio communications with  
17 Plymouth, which is several very wet miles away; and efforts  
18 underway for coordination with Duxbury and concludes that  
19 these provide acceptable flexibility.

20 How? Can a siren part the waters or a radio float  
21 you across the bay? Have a heart, a head, and admit there's  
22 a problem. If you refuse to acknowledge that a serious fix  
23 is in order, then at least recommend not sounding the alarms.  
24 If the people can't go anywhere, why upset them? Wait till  
25 the waters go down and the roads, perhaps, were passable. We

1 all know that there is no way out when these are flooded.  
2 Facing facts may be not flexible, but it has the advantage of  
3 at least being honest and realistic.

4 Second comment. 2-80. The draft report correctly  
5 notes that, quote, "The current Duxbury plans do not take  
6 into consideration the fact that a large number of  
7 transportation dependent persons could be at the  
8 Gurnet-Saquish gate." However, your comment that, quote,  
9 "The Duxbury civil defense director reassured the  
10 Gurnet-Saquish Association representatives that Duxbury  
11 accepts responsibility for the evacuees as they travel  
12 through", through is a key word, "Duxbury," misses the point.

13 It's several miles from Gurnet-Saquish gate to  
14 Duxbury and the evacuees still have no way to get from one  
15 point to the other. That is the point that you missed.

16 Comment three, Section 2-74. Clark's Island, Pages  
17 2-82. The above commentary about Saquish neck is equally  
18 applicable to Clark's Island. In neither case is there any  
19 realistic possibility of an evacuation during many regular  
20 tidal conditions. There is no realistic way that this can be  
21 achieved; it defies reality.

22 The next comments I have are on Section 2.12,  
23 persons with special needs, issues not addressed by the task  
24 force. Effectively, there is no staff assigned for special  
25 needs evacuees at the Wellesley reception center until the



1 National Guard arrives. I feel this is a violation of  
2 NUREG-0654J12. Additional comments. Latchkey children. The  
3 draft reports says, Page 2-119 that, quote, "The state's  
4 position that children home alone can be considered part of  
5 the general population" appears reasonable. And attempts to  
6 support this conclusion with its observation that Page 24 of  
7 the 1991 public information calendar advises the public to,  
8 quote, "Make sure all members of your family, especially  
9 children who may be home alone, know what to do in the case  
10 of an emergency."

11 We fail to understand how the task force could  
12 reasonably reach this conclusion. Children very clearly meet  
13 the criteria of transportation dependents and special needs.  
14 They do not have driver's licenses. They are not adults and  
15 they can not be expected to act as adults, especially in an  
16 emergency situation. This is reality.

17 A recent school daycare needs assessment in Duxbury  
18 found that 70 odd percent of the Duxbury school population  
19 are latchkey children. In taking its position, the state  
20 recognized that it had a special need to get rid of this  
21 problem by redefining it.

22 A realistic and obvious solution exists. Run the  
23 school buses, the same ones which just dropped them off,  
24 along the school routes to pick them up again to evacuate  
25 them. This had been suggested but nobody has commented,

1 because in redefining the latchkey children as not special  
2 needs, the problem is then thrown away and no attempt in  
3 reality to solve it has been made.

4 Consistent with the suggestion to BECos 1991  
5 calendar, the children, if you followed the plan of sending  
6 the buses out again, could be taught to get back on the  
7 buses. If it were an emergency.

8 Two, the buddy system. The draft report Page  
9 2-120, states that the Massachusetts Office of Handicapped  
10 Affairs has strongly objected to the use of volunteers to  
11 assist persons with special needs during a manmade, i.e.,  
12 nuclear accident and believes that professional care should  
13 be contracted for this purpose instead. Any realistic look  
14 at the buddy system favored by the state and town -- or why  
15 other states across the nation do not allow it. Is BECo  
16 going to provide the buddies with long range pagers with  
17 lifetime maintenance contracts?

18 Nursing homes, Plymouth House of Corrections. The  
19 draft report noted that, quote, "The task force could not  
20 identify monitoring provisions at the host facilities nor  
21 could it identify plans to send nursing home residents  
22 elsewhere for monitoring and decontamination, Page 2-121.

23 Essentially, the same situation was identified with  
24 respect to the Plymouth House of Corrections, Pages 2-121,  
25 2-123. And apparently exists with respect to the injured

1 contaminated. All of these appear to be in violation of  
2 NUREG-0654J12.

3           Sheltering. Issues addressed the task force, I  
4 have covered here. Additional comments. The draft reports  
5 that, quote, "No realistic dose reduction study has been  
6 performed for the shelters in Duxbury." The excuses for this  
7 deficiency provided by the task force again defy reason. For  
8 example, Excuse No. 1, quote, "NUREG-0654 states that the  
9 shelter dose reduction factor should be included in the basis  
10 for the selection of protective actions. This does not mean  
11 that each and every building must be analyzed to determine  
12 its individual shelter factor." End quote.

13           We agree that reason does not dictate doing each  
14 and every house. However, a reasonable man would suggest  
15 doing the main primary town shelters, such as the school.  
16 Children particularly, since the buses to evacuate them  
17 probably won't arrive in time in the event of a fast breaking  
18 accident.

19           Which leads to Excuse No. 2. "The most  
20 appropriate," quote, "protective action for areas within  
21 about two miles of the plant in severe core melt accident  
22 sequences is immediate evacuation" and, quote, "The task  
23 force did not visit or evaluate the adequacy of Mass. public  
24 shelters for the transients, since both FEMA and the NRC have  
25 concluded that it is better to evacuate transients from the

1 EPZ than to move them to Mass. public shelters within the  
2 EPZ."

3           Several questions are immediately apparent. FEMA's  
4 two mile statement was made in the context of Seabrook.  
5 NUREG-0654 recognizes sheltering as an effective and  
6 necessary protective action, and all of the towns have  
7 included it as part of their planning. Because you can't do  
8 it in Seabrook doesn't mean we shouldn't have it here. The  
9 FEMA and NRC conclusion that evacuation of transients is a  
10 preferable course has nothing to do with school children and  
11 other residents who aren't transient.

12           School children in particular are already in  
13 buildings that are proper dose reduction studies have been  
14 accomplished can serve as main Mass. public shelters. In the  
15 case of school children and other residents, it isn't a  
16 question of whether to move them to shelters or to evacuate  
17 them. The NRC and the FEMA conclusion assumes that everyone  
18 is already on the buses and ready to go somewhere.

19           For children in the schools and the other  
20 transportation dependent, the problem isn't what to do once  
21 you're on a bus; rather, it's what if there is no bus or  
22 there simply isn't time to evacuate? What do you do ?  
23 Again, reality. Even BECo and the BECo drafted IPs have  
24 recognized the important role of sheltering. Why else, for  
25 example, do we have shelter signs outside some of our

1 buildings provided by BECo? And why are these shelters in  
2 the emergency information distributed by the utilities?  
3 Obviously sheltering is a key part of planning and dose  
4 reduction analysis of Mass. shelter buildings is an essential  
5 first step.

6 Last issue I will discuss. The direct torus vent  
7 system. The draft report noted that the task force, quote,  
8 "Concludes that existing emergency operating and associated  
9 direct torus vent procedure may not result in the proper  
10 emergency classification and off-site notification preceding  
11 the activation of the direct torus vent and considers it  
12 important that BECo develop and implement appropriate  
13 controls to enable BECo to notify off-site agencies before  
14 the activation of the direct torus vent."

15 However, the report said nothing about the  
16 timeframe within which the controls were to be implemented  
17 nor what should be done in the interim. The realistic  
18 solution appears simple. Recommend the NRC prohibit use of  
19 the direct torus vent until such time as BECo has developed,  
20 and the NRC and FEMA have approved, state and local officials  
21 have implemented procedures that will insure that an  
22 emergency will be declared. And that the off-site  
23 authorities have all done emergency planning will be notified  
24 before the direct torus vent is opened.

25 In conclusion, I think I brought up many points and



1 I'm trying to be brief and there are other points that I will  
2 hand to you, that indicate very clearly that the plans that  
3 you have identified any areas of violating NUREG-0654.

4 I feel further, as selectman Alba Thompson has  
5 pointed out, and others, that when there has been a lack of  
6 specific regulation to point to, then your reasoning defies  
7 any concept of reality. And I think you have a serious  
8 problem there, too. Thank you for your efforts.

9 [Applause.]

10 MR. ERICKSON: Thank you. Thank you for your  
11 comments. The next speaker we'd like to invite to the  
12 microphone is Mr. David Quaid.

13 MR. QUAID: I'm speaking for the Gurnet-Saquish  
14 Association. And we thank you for the opportunity for this  
15 input. Upon receipt of NUREG-1438, the emergency planning  
16 committee of the Gurnet-Saquish Association met on two  
17 occasions to evaluate the findings contained thereof. The  
18 committee agreed on the following, 1] The committee was  
19 startled to find absolutely no mention in the report of soft  
20 sand condition of the cross over between Gurnet point and  
21 Saquish beach.

22 In a report by David Quaid, residents of Gurnet t  
23 to Samuel Chilt, secretary of the NRC, dated September 17th,  
24 1988, this situation was delineated by text, maps a series of  
25 eight by ten aerial and ground photographs.

1           Page 2, Paragraphs 5 and 6 of the September 17th,  
2 '88 report to Samuel Chilt, quote, "During the monthly  
3 astronomically high tides, the marsh area between Gurnet  
4 point an Saguish beach is inundated from any vehicle traffic  
5 across the road at A" -- These letters indicate positions put  
6 on the maps and photographs which we do not have here now.  
7 "And the back road at C. B is the one soft sand principal  
8 access to Saguish beach. At the very best of times, getting  
9 through B without meeting another vehicle coming in the other  
10 direction is by chance. Someone must back up. In an  
11 emergency, B would prove to be a very difficult situation  
12 indeed.

13           "Recommendation for Saguish beach. The roads at A  
14 and C, see Photo 8, must be raised for all-weather access.  
15 The gap at B must be double-tracked to make an evacuation at  
16 all possible." Close quotes.

17           The cross over is a single lane sand trap. It's  
18 not double-tracked. During the last Memorial Day weekend, in  
19 excess of 34 four-wheel drive vehicles were trapped in a  
20 cross over. Several times more than one were stacked. As  
21 many as 15 vehicles were backed up on either side of the  
22 cross over as efforts were made to clear the blockage. On  
23 nine separate occasions the gate watch, [Gurnet-Saguish  
24 security] called the resident civil defense official to help  
25 alleviate the problem.

1           During the week, one woman skilled at driving on  
2 sand became stuck three times on one trip. The following  
3 weekend a four by four was stuck in a cross over; it 15 men  
4 to free it. This vehicle's drive train was ruined in the  
5 process. While on an inspection trip around Gurnet-Saquish a  
6 couple falls ago, George Mullahey of the Inspector General's  
7 office of the NRC and the David Quaid were stuck in the sand  
8 for a period of three hours.

9           The sand is an ever present impediment to  
10 evacuation of the area. Two, tidal data, Page 2-60, Table  
11 2.1. This table of the highest monthly tides of Boston shows  
12 that during the months of maximum occupation of  
13 Gurnet-Saquish, the summer months, the astronomical tides are  
14 the highest of the year equalled only by December/January.

15           The winds of the summer months are generally  
16 prevailing from the southwest, but much of the time are also  
17 from the southeast, coming directly from Pilgrim I to  
18 Gurnet-Saquish, just four scant miles across the water. The  
19 time of greatest occupation is obviously also the time of  
20 greatest possible hazard from the plant.

21           The task force, provided a videotape entitled  
22 "Observation of tidal conditions at Saquish/Gurnet and Clarks  
23 Island, Massachusetts 10/6-7/1990. This videotape was shot  
24 on a mild day with light winds and merely 11.5 inch tides.  
25 The tide tables published for the 1991 summer months show the

1 tides for the four months of summer averaging twelve foot. A  
2 full seven inches higher than shown on a video tape. This  
3 video tape taken from the inside of the CD vehicle, looking  
4 forward through the windshield, documents a slow trip of  
5 about a half hours, over the inundated roads of Saguish.

6 An event at Pilgrim I this summer necessitating  
7 evacuation during a lunar tide would have to prove a  
8 disaster. On a flat, calm day the tide height on a back road  
9 will be an excess of 20 inches deep. A column of vehicles  
10 moving through the water will certainly produce a wave action  
11 which would quickly stall some of them, use of a wet  
12 ignition, impeding if not ending the evacuation.

13 We believe there also could be panic. The task  
14 force feels that an evacuation in a nuclear emergency can be  
15 equated with problems like natural phenomena, such as ice,  
16 fog, hurricanes and the like. This is absurd. People react  
17 well during natural disasters. In fact, we leave the area  
18 long before the onset of a hurricane. But this might not be  
19 the case in an unnatural disaster, a nuclear disaster.

20 People can relate to and handle physical problems  
21 which can be seen, touched and contested against. We do not  
22 believe it would be the same against an invisible threat to  
23 their well-being.

24 Three. Population estimates. Boston Edison  
25 estimates from aerial photographs taken during the summer of

1 1987 that the summer population of the area is 650 people.  
2 They stands with that figure for evacuation planning. In  
3 1988, at an emergency response meeting in Duxbury attended by  
4 Cavanaugh and David Quaid, Al Sama, the off-site supervisor  
5 for Pilgrim, I stated that BECo had conducted an overflight  
6 on a pleasant summers weekend and estimated that the total  
7 beach population at 16,000. Our estimate for Gurnet-Saquish  
8 is 3500 to 5,000 people. At a meeting with Craig Concoran of  
9 the NRC a figure of 3,000 to 5,000 as agreed to for emergency  
10 planning.

11 There are 200 homeowners in the area, but there are  
12 another 200 plus property owners who use the beach but are  
13 not included in BECo estimates. The photograph included in  
14 the report shows some of those who arrived by boat but not  
15 considered in the task force report.

16 Four, we question the adequacy, reliability and  
17 quality of communication equipment furnished by BECo. To  
18 date, there has not even been a test to certify that of this  
19 equipment is functional.

20 Five, interface with the town of Duxbury has not  
21 been pursued. They have had meetings for three months. We  
22 have just gotten notice of a meeting for June 26th. With  
23 this late start, nothing concrete will happen until after the  
24 busy season is over. In essence, we have lost another year.  
25 The buses for Gurnet-Saquish evacuation are not settled. At



1 a task force meeting approximate months ago, was to work out  
2 details of a bus commitment with Bonnie Yetman of BECo and Al  
3 Slaney of Commonwealth. This is a great disappointment for  
4 our membership.

5 Summary. We feel that the task force report is  
6 biased in favor of BECo and totally unrealistic on area  
7 emergency planning. NUREG-1438 Section 2.7 Gurnet-Saquish B  
8 findings paragraph four, quote. "BECo offered to construct a  
9 road across the dunes to provide an evacuation route that  
10 would not be subject to flooding. However, as indicated at  
11 the task force meeting with BECo on February 19th, 1991, the  
12 Gurnet-Saquish Association did not accept its proposal  
13 because the residents were concerned that the environmentally  
14 sensitive dunes might erode."

15 This offer by BECo to build a road across the dunes  
16 is most cynical an arrogant solution to a serious human  
17 safety problem. BECo is well aware that no state or federal  
18 agency would permit such a road to be built. The  
19 Gurnet-Saquish Association members have labored over the  
20 years to protect this barrier beach which prevents the open  
21 ocean from invading the towns of Plymouth, Kingston, and  
22 Duxbury. The most disturbing of the BECo road offer is that  
23 the task force accepts the BECo offer without any further  
24 investigation and the language of the paragraph unfairly  
25 blames the owners for lack of progress on a Gurnet-Saquish



1 Association.

2           It is with great reluctance that we must conclude  
3 that the NRC task force report ignores and plays down the  
4 true difficulties of a evacuation at any time. Anyone who  
5 viewed the NRC videotape and still feels that orderly  
6 evacuation during the lunar tides is possible is at the very  
7 best few foolish and naive. BECo does not want to raise the  
8 evacuation route, so the task force makes believe that  
9 evacuation under flood conditions is viable. The report  
10 reveals a disturbing lack of interest by the task force and  
11 public safety. It seems to be an attempt to legitimize the  
12 fraudulent emergency planning by the NRC that resulted in an  
13 recent office of the Inspector General investigation. Some  
14 of us believe that this lack of interest in public safety  
15 could be viewed as criminal.

16           The cross over must be double-tracked. The back  
17 road must be elevated for safety. And also for a sense of  
18 security and peace of mind for the area residents.  
19 Respectfully submitted, Emergency Planning Committee,  
20 Gurnet-Saquish Associates.

21           I would like to make a personal comment. I have  
22 been a renter or visitor at Gurnet point since immediately  
23 after World War II. I have had the opportunity to view the  
24 situations out there under every condition. I am aghast at  
25 the findings of your task force. You believe that

1 intelligent people could view the conditions out and come to  
2 the conclusions that you incorporated in your report? I  
3 would like to, also, include some of the recent newspaper  
4 articles, for your interest. BECo probes system failures.  
5 Pilgrim officials confirm failure of cooling system.  
6 Officials were kept in the dark. Fax, frenzy slowed Edison's  
7 fire facts. Pilgrim shutdown moves up NRC inspection. Fire  
8 breaks out at Pilgrim.

9 This is why people in this area are worried about  
10 the ineptness of the plant. And obviously, the fact that the  
11 plant must be deteriorating to have this kind of trouble  
12 constantly. I thank you.

13 [Applause.]

14 MR. ERICKSON: Thank you, Mr. Quaid. I'd like to  
15 ask you one question. Is it your -- Am I correct in saying  
16 that you consider the solution to the evacuation of Saguish  
17 to be to date up the roads?

18 MR. QUAID: Yes.

19 MR. ERICKSON: Okay.

20 MR. QUAID: I'll go further on that.

21 MR. ERICKSON: No, thank you. Thank you much,  
22 sir.

23 Is there a David Slesinger here?

24 Can you clearly state your name and your  
25 affiliation, Mr. Slesinger?

1           MR. SLESINGER:   My name is Bart Simpson and I  
2   represent the Cartoon Characters United for Ecological  
3   Sanity. And I want to start out by saying that this rt as a  
4   professional, as a professional at entertaining people, this  
5   report is a bad joke. I would like to also say that the  
6   details of what would make an acceptable evacuation plan are  
7   irrelevant. Why? Because Edison and the NRC and FEMA are  
8   never going to tell the public that there's a serious  
9   accident quickly. You're going to stall. You know that.  
10   This is crazy.

11           I want to ask a question of the audience. How many  
12   people here believe that if there's an accident at rim that  
13   the public is going to be notified in a timely fashion? Is  
14   there anybody in the audience who will believe that it will  
15   happen in a timely fashion? None. I think that's striking.  
16   None.

17           Next, I want to say that if either FEMA or the NRC  
18   or any part of it were to ever admit the truth, the truth  
19   about evacuation is there is such thing as an evacuation plan  
20   that will work. If either of your agencies would admit the  
21   truth, that there's such thing as a safe evacuation plan, I  
22   will illustrate personally eat that report. You send it to me in  
23   care of the Cartoon Characters United for Ecological Sanity  
24   and I will publicly eat that report.

25           I have one more question for the audience. How

1 many people in the audience have heard that the so-called  
2 Mafia is more of a threat to the health and safety of them  
3 and their loved ones than Edison, FEMA, and the NRC, and the  
4 people who run the Pilgrim nuke? How many are more afraid of  
5 the Mafia? I think that's also pretty striking.

6 Now, I'm going to take my mask off. Because I want  
7 to look you folks in the eyes and see my eyes. I'm David  
8 Slesinger. And it's very unusual, you really are looking me  
9 in the eyes. Most of the time, the NRC officials shuffle  
10 paper. When I've spoken to them in the past, so let me  
11 commend you.

12 So I've just said that I feel you folks are like  
13 gangsters, that's horrible. You don't want to be gangsters.  
14 What type of a life is that? I mean, at least with the  
15 Mafia, they basically don't hurt people unless you're stupid  
16 enough to deal with them.

17 You can, everybody here -- The people didn't raise  
18 their hands because people don't deal with the Mafia so we're  
19 not particularly afraid of them. But the people that you  
20 folks kill are just random. Whoever happens to be in the  
21 wrong place at the wrong time. Radiation gets out of this  
22 plant regularly, even if there's not a big accident and  
23 you know that. It's -- You don't want to be gangsters.  
24 You're killing people. You're killing innocent people. Even  
25 if they aren't innocent, you're killing people. You're

1 gangsters. You don't want to be gangsters. Well, you might  
2 be saying, "Well I'm concerned with public health and the  
3 reason I'm in my job is even though my superiors may not  
4 understand, I might be able to do a little bit." You know  
5 who your superiors are. You know the people in charge of  
6 this decision.

7 There's no way they'll ever admit that there's such  
8 thing. That there's a safe evacuation plan. If you were to  
9 say something like that, you'd be out the door in a minute.  
10 The best way you can help people is to come forward and  
11 expose the lies.

12 MR. ERICKSON: Can you wrap up, Mr. Slesinger,  
13 please?

14 MR. SLESINGER: Excuse me?

15 MR. ERICKSON: I just wanted to ask you to please  
16 wrap up, so we could move onto another speaker as well.

17 MR. SLESINGER: Okay. I hope you'll take this to  
18 heart, sir. Please don't be a gangster. It's really a  
19 horrible way to live your life.

20 MR. ERICKSON: Thank you, Mr. Slesinger.

21 [Applause.]

22 MR. ERICKSON: Is there a Paul Gunter here? 07

23 MR. GUNTER: Well sir, since this microphone is 08 little  
24 bit low, does this pick up okay for the report? 09 name is  
25 Paul Gunter. I'm a co-founder of the Clamshell Alliance and

1 I have been active with this concern for the last 15 years.

2 I come here with the expertise of watching the  
3 activities of the Nuclear Regulatory Commission and Federal  
4 Emergency Management Agency and how they dealt with forcing  
5 the operation of Seabrook station on us in New Hampshire and  
6 in New England.

7 I think that the reason that I came down here, and  
8 I apologize if there are those among you who feel that I'm,  
9 that I have overstepped my bounds coming into your community;  
10 but the message that I would bring to you is first of all,  
11 that with a community with the cultural heritage of the last  
12 four centuries, it's important for us to understand the  
13 importance of that.

14 And the striking thing about this industry that the  
15 NRC and FEMA are involved in regulating is that the  
16 consequences of an accident at the Pilgrim nuclear power  
17 plant would -- could I should say, could very well eliminate  
18 the heritage of your community.

19 And you know, I think that one striking example is  
20 and I would speak directly to your report NUREG-1438 in this  
21 regard, is that this report is strikingly deficient in terms  
22 of scope of the disaster, the potential disaster at the  
23 Pilgrim nuclear power plant. And it is completely deficient  
24 in the scope of reentry and recovery of communities as a  
25 consequence after catastrophic release from that power plant.



1           Now, the reason that I come before you is first of  
2 all to speak to this distinguished body and this  
3 distinguished community to say that this report is not an  
4 evacuation plan. This report is, in fact, the continued  
5 licensing of the Pilgrim nuclear power plant and the purpose  
6 of this report is not to provide for safe evacuation, this  
7 report is to provide for the continued operation of the  
8 Pilgrim nuclear power plant, an antiquated technology of a GE  
9 BWR Mark I that the industry has clearly recognized as an  
10 extremely dangerous reactor. So much so that this particular  
11 reactor has been outfitted with a direct torus vent and the  
12 sole purpose of this was to preserve the structural integrity  
13 of the reactor in the event of an over-pressurization  
14 accident.

15           And that means that their going to vents Boston  
16 Edison will directly vent radiation from the primary  
17 containment of this building and, as I understand it, this  
18 report says without necessarily activating the emergency  
19 notification procedures. Am I correct, Mr. Chair? Is it  
20 true that this report states--

21           MR. ERICKSON: Our report stands as we wrote it.  
22 And if you are quoting from our report--

23           MR. GUNTER: Are you familiar with a chapter--

24           MR. ERICKSON: That is our report and what we have  
25 said, we've said and it's part of the potential problem we

1 have identified.

2 MR. GUNTER: Okay. I'd like to indulge you just  
3 for a moment. I think what this states is that the DTV will  
4 be activated and that people will not necessarily be  
5 notified. So what's the point of an evacuation plan in the  
6 first place? What's any more different about that case than  
7 when Boston Edison vented radiation in 1978 from La` fuel  
8 that, you know, has caused leukemias in this community since  
9 that time? What distinguishes that situation from the  
10 situation that's been happening all along at the reactor? I  
11 don't believe that there is a distinction.

12 MR. ERICKSON: Mr. Gunter, with all due respect, I  
13 recognize that you have strong sentiments about these points  
14 that you're making, but it would be very helpful if you could  
15 confine your remarks more to the content of the draft report,  
16 because we're trying to refine that.

17 MR. GUNTER: Okay. I think the DTV, in and of  
18 itself should, that this committee should not be recommending  
19 evacuation procedures, but should be standing strong on the  
20 position that this reactor is extremely dangerous and that  
21 the DTV precedent should call for this committee saying that  
22 the only relevant protection is prevention and you have to  
23 shut this reactor down and that's, I think that's the  
24 position that you should be taking.

25 Not whether or not you can put, you know, asphalt

1 over a sandy beach, because the scope of this is sorely  
2 deficient. I mean, I come down here from New Hampshire  
3 because -- Well, let me just explain one thing.

4 MR. ERICKSON: Mr. Gunter--

5 MR. GUNTER: I understand, you want to go home.

6 MR. ERICKSON: No, what we are concerned about is  
7 that citizens in the local community here have an opportunity  
8 to speak and we would like to proceed.

9 MR. GUNTER: Well, okay if you will allow me,  
10 without interruption, I will try to be brief, okay? First of  
11 all, the situation is that it's not a local problem. The  
12 Pilgrim reactor and you know, this is for the record. We  
13 understand that the Pilgrim reactor is -- Its containment is  
14 rated at 30 PSI, okay? That's under tire pressure.

15 And that that carbon rupture disc for that torus  
16 vent will rupture at 30 PSI, vent directly to the atmosphere  
17 and that's with no filtration system, okay? So that's one,  
18 okay? But the scope is another. You know --

19 Let me just give you a quick quote for the record.  
20 On July, no June 15th, 1986 the New York Times reported a  
21 press conference in Moscow and in that press conference a  
22 noted Russian historian took the podium and before  
23 international press said this -- This is extremely important.

24 And he held up a bible in one hand and he held up  
25 the Ukrainian dictionary in the other and he said, before an

1 international press, he read from the book of Revelation is.  
2 Chapter 8, verses 10 and 11. And it reads to the effect "And  
3 the third angel sounded and a great star fell upon the earth,  
4 burning as it were a lamp. And the name of the star will be  
5 wormwood and a third of the waters, rivers and fountains were  
6 made bitter." Because they were made bitter with wormwood  
7 and many men died. He closed the book of Apocalypse and then  
8 he opened the Ukrainian dictionary and the Ukrainian word for  
9 wormwood, which is wild herb which grows in the steppes of  
10 the Ukraine is Chernobyl.

11 Then the article goes on to talk about  
12 contamination and how the food contamination is, you know, is  
13 common talk.

14 MR. ERICKSON: Can you wrap up in about one  
15 minute, Mr. Gunter, please?

16 MR. GUNTER: You know, this reactor has been  
17 operating since 1979 in the absence of an adequate evacuation  
18 plan and you wish to limit comments of the public because--

19 MR. ERICKSON: No, sir, I'm most concerned about  
20 providing opportunities to local citizens to make their  
21 comments.

22 MR. GUNTER: Okay. I'll close on this. And I'll  
23 keep my remarks specific to the inadequacies of recovery and  
24 reentry. Now, you wish to limit the remarks with regard to  
25 local people and I--

1           MR. ERICKSON:   We're not trying to limit your  
2   remarks, we're just trying to be fair about this.

3           MR. GUNTER:    I understand that.   Well, I think  
4   it's fair to say that given the example of the Chernobyl  
5   accident where Scandinavia, Finland, Eastern Europe, Southern  
6   Germany, Italy, Turkey, Ukraine, Southern Russia have been  
7   affected by an accident, that it's fair to say that a ten  
8   mile emergency planning zone is completely ridiculous.

9           And nobody that would sit up here and talk about  
10   having a plan that limits the scope of your concerns to ten  
11   miles should be, should have their head examined because  
12   this, if there is a release, it will go far beyond ten miles.  
13   And like I said --

14           In closing, this is not an evacuation plan.   This  
15   is an effort to keep the reactor on line and I think that  
16   anybody on this committee that takes that to heart is going  
17   to know that they have a responsibility to tell the truth.  
18   And the truth is that this is a big cover up.

19           [Applause.]

20           MR. ERICKSON:   I understand that Heidi Price would  
21   like to speak and that she said that she had a very short  
22   comment.

23           MS. PRICE:    It's short.   My name is Heidi Price, I  
24   live in Plymouth -- between a rock and a hard place. I've  
25   looked at the findings here and I'm overwhelmed with the



1 number of unresolved issues and the fact that the plant  
2 continues to operate.

3 To save time, I'm in complete concurrence with Alba  
4 and Mary Lampert and what Jane's going to say. I read the  
5 portion about potassium iodide, that's 2-153 and I find it  
6 hard to believe that Boston Edison feels a responsibility to  
7 the thyroids of only inmates of the farm, nursing homes and  
8 of civil defense officials. In the wake of Chernobyl, we  
9 know just how important it is to protect our thyroids.

10 Since Boston Edison is putting us all at risk, I  
11 think Boston Edison should be responsible for stockpiling  
12 potassium iodide for each and every person within the EPZ  
13 whose thyroid they haven't already toyed with in their normal  
14 operations.

15 The question of egress is another big one,  
16 especially for those of us who are expected to be by way of  
17 Route 44. We, that's 2-83, we know we have a better chance  
18 if we swim east. And I am not kidding.

19 [Applause.]

20 We know that Boston Edison and the NRC expect a  
21 certain number of casualties and we know that we are among  
22 them. This isn't a war and Boston Edison isn't our  
23 government. Is it?

24 In preparation for this meeting, I have produced  
25 these findings and I've taken a look at No. 12 of the



1 off-site emergency training pertaining to emergency response  
2 and this is all of the information, I didn't get this one,  
3 just the little one. It's all the information that my son's  
4 school has pertaining to emergency response.

5 I've made a number of phone calls regarding the  
6 emergency plans of the two private schools my kids attend, I  
7 live in Plymouth, one kid goes to school in Kingston, another  
8 goes to school in Duxbury. So it's a very difficult thought,  
9 if you're thinking about evacuation.

10 I made a lot of phone calls the past couple of days  
11 preparing for this meeting and no one seems to be able to  
12 give me any immediate concrete information and there seems to  
13 be a great discrepancy between the number of people needing  
14 evacuation and the number of buses available. A very big  
15 discrepancy. All that I could find out in two days of making  
16 telephone calls was that some lady on the Board of Health  
17 from Duxbury who was on vacation but was supposed to be the  
18 one to call my son's school, but instead, since she wasn't  
19 available, then the building inspector was the one who was  
20 supposed to be responsible.

21 I don't know about you, but have you ever tried to  
22 get in touch with the building inspector? I don't know about  
23 you but these don't sound like very good plans to me. This  
24 small bit of research that I did leads me to wonder a  
25 disturbing conclusion.

1           People in the EPZ have been lulled into living in a  
2 state of denial. Everyone who lives here knows very well  
3 that there's no workable plan. There is no way out. Nobody  
4 wants to face up to the real probability of an emergency,  
5 therefore no one is willing to be prepared. one is  
6 prepared, and one ever will be prepared. This fat book of  
7 findings here fails to address the real issue of our  
8 emergency preparedness.

9           And that is, there is no workable plan. There is  
10 no reasonable assurance and you can't get there from here.  
11 You can't.

12           [Applause.]

13           MR. ERICKSON: Is Priscilla Dean here?

14           MS. DEAN: My name is Priscilla Dean and I'm from  
15 Cape Cod. I am a retired dental hygienist. I was trained to  
16 take dental X-rays. We used a lead apron to protect the  
17 patient's body; we used a collar to protect the thyroid in  
18 the neck. I left, I left the room. I stood behind a lead  
19 wall and pushed the timer. The patient was exposed for two  
20 or three seconds.

21           I cannot imagine the horror of five minutes of  
22 radiation or an hour or five hours of exposure while buses  
23 come and people are evacuated. In my opinion, men, women and  
24 children in this densely populated area are doomed if there  
25 is a nuclear accident.

1 I appreciate an opportunity to express my opinion.  
2 We do have choices. We must choose to eliminate Pilgrim  
3 nuclear power. America's hometown is at risk. As are many.  
4 many other towns for many miles around.

5 Around Chernobyl 10,000 people are dying of  
6 radiation exposure, after a nuclear accident. Children 180  
7 miles away are showing the same symptoms as the workers from  
8 that nuclear power plant. The real estate market is not  
9 good in that area.

10 [Laughter.]

11 Russians are warning us of the danger. We have the  
12 potential here for more of the same. And what are you doing  
13 with the nuclear waste? We have a monster in a canary cage,  
14 and there are many ways for that monster to escape. The  
15 danger is always there. If, God forbid there were a nuclear  
16 accident that people from Cape Cod must go in the direction  
17 of the accident? That's our evacuation plan. This is our  
18 escape route. This is insane.

19 One off cape bridge is to be closed to us. On a  
20 normal day, we can't get over two bridges. Your evacuation  
21 plan is non-existent, there is no escape for us, we must swim  
22 east or die.

23 I want this plant closed before an accident, not  
24 after. Close this nuclear power plant now. Thank you.

25 [Applause.]

1           MR. ERICKSON:    Is there a Sean Fensel here?   Mr.  
2   Fensel.

3           MR. FENSEL:    My name is Sean Fensel.   I enjoy the  
4   position of being in acute mercy for you when it comes to  
5   this issue because I'm not only a citizen of this town for  
6   the past 25 years, but a vice-president of Plymouth Nuclear  
7   Information Committee for the past 15 years and I also sit on  
8   the town's radiological response planning committee and on  
9   the town's nuclear affairs committee.

10           I hadn't planned to speak this evening, but there  
11   are some quick points that I think should be made and I'm one  
12   to welcome the fact that you're here.   On this plan and on  
13   your purpose for being here.

14           I think that all name calling is irrelevant.

15           I don't see anyone in this as evil, I'm hoping that  
16   what we've seen as mistakes have been either well-intentioned  
17   or bureaucratic blunders.   What the townspeople of Plymouth  
18   and the citizens of the United States need from the NRC is  
19   some kind of assurance that you people are honoring the  
20   middle word of your name.   We have all too often seen  
21   evidences that you're not regulating, but promoting.   We  
22   need to see that you're protecting us, for one.   For  
23   instance, I hope to avoid this disaster and all of this in  
24   the future, I would hope that you gentlemen would insist that  
25   an evacuation plan, a workable evacuation plan be on your

1 table before a plant is sited, because this, the siting of a  
2 nuclear power plant in this spot --

3         Despite the fact that it's an aging BWR; despite  
4 the facts that it's a commercial area for tourist  
5 attractions; despite the fact that it's on the seacoast with  
6 only 182 degrees of egress; despite the fact that it's, that  
7 the town of Plymouth made a mistake as well in that we did  
8 not take the tax boon of Edison and sequester it somewhere,  
9 we put it into our general funds and it artificially  
10 depressed our tax rate for so long that it sucked people into  
11 our town and gave us a tripled problem on evacuation planning  
12 because we have more schools and more load on roads and town  
13 services that are already taxed by the sheer geographic size  
14 of our town.

15         On the plan -- and these are just some impressions  
16 and I'm hoping that by my repeating a couple of them briefly  
17 it will emphasize some of the more detailed statements that  
18 you've gotten and will get. We need an alternate EOC closer  
19 than Bridgewater. It's unworkable.

20         Two, one of the things that I brought up at the  
21 Duxbury hearings a year and a half or two ago was that one of  
22 the my first concerns as the citizen member of the emergency,  
23 RERP committee was to do a minimum manpower valuation of the  
24 plan. I don't think it's ever been done adequately.

25         Because we have a number of municipal servants,



1 including school teachers in Duxbury, Plymouth and Kingston  
2 who have expressed their willingness to not participate in  
3 the plan. To my way of thinking we've got a problem in two  
4 basic areas: the school departments and the Department of  
5 Public Works in all three of the major towns.

6 And I'm not saying that any of the towns in EPZ are  
7 not major, but you know, the ones closest to the plant, we  
8 have a problem in that I, as a member of the RERP do not have  
9 the assurance that we've sufficient manpower to minimally run  
10 the plan. All of these other concerns are ludicrous if we  
11 don't have the manpower. If we don't have enough people that  
12 are going to stay and help.

13 Now, I'm a Yankee, and like Alba and a number of  
14 other people, I believe that when asked, people will  
15 volunteer. At a time of crisis, I believe that people will  
16 come forward. But we do not have, that's not, that's not  
17 solid planning. That's not the kind of thing that we would  
18 like to present to the NRC or have the NRC or FEMA present to  
19 us. That's a consideration that you should think about.

20 Another thing, radio communications with the school  
21 buses at the moment is citizens band radios or worse. One  
22 radio to a convoy of buses. I think that you ought to  
23 examine in that plan exactly how a radio communication to the  
24 school bus, school buses that are doing evacuation, are going  
25 to be handled, because I'm a citizens band operator and I



1 think that there are a few people in the nuclear industry who  
2 know what affects the sun spot activity is having on  
3 transmissions and on transmission lines and it's certainly  
4 having an affect on radio communications. The static is so  
5 high in the daytime that communications over a limited, over  
6 anything but a limited area is extremely short with the  
7 citizens band radio. In the school plan; if you'll notice  
8 in the school part of the plan, there is a paragraph that  
9 concerns us, it concerns a number of us in Plymouth. And  
10 that is, we couldn't see legally how we could exclude this  
11 one paragraph that allows parents to show up to remove their  
12 children before they're evacuated. Gentlemen, I want you to  
13 imagine that in the school system the size of Plymouth the  
14 effect of a number of misinformed, uninformed parents showing  
15 up at the schools to take their kids out. With the number of  
16 children who are iffy on the plan anyways, being able to  
17 account for sign out and be able to account for, at the  
18 receiving end, missing children that have been signed out to  
19 parents or people who say they are parents. It exists in the  
20 plan and we had to leave it in. It's been passed the school  
21 board. It's in the concept in front of you, but it's a real  
22 concern to me.

23 If those people were told "If you want to come pick  
24 up your kids, you are thereby volunteering to stay and help  
25 with the remainder or there was some way of dealing on our

1 narrow roads here-- in this 350 or 400 year old town, are  
2 cow paths paved.

3 We, I would like those of you who have direct  
4 connection with FEMA, I mean I understand that the normal  
5 process was gone by on Edison. Normally speaking, NRC would  
6 have a FEMA report and when you had the FEMA report before  
7 you, you guys would set it up. This time around it it went  
8 backwards. We by passed FEMA's recommendations. If you make  
9 any changes at all at the federal level, I certainly hope  
10 that the NRC is willing to be bound by rulings on FEMA. As  
11 it is now, FEMA could rule against an evacuation plan and the  
12 NRC could still pass it. I think as a citizen and as a  
13 member of any body with any common sense, that does not make  
14 any sense when we have a federal agency whose title is  
15 Emergency Management and its rulings and its dictates could  
16 be ignored by NRC. Then it does the American citizens  
17 believe that the NRC is there to promoted the continuation of  
18 the use of nuclear power without regulatory safety.

19 That's something which you gentlemen can change just  
20 assurances and a willingness to accept FEMA's rulings.

21 MR. ERICKSON: Do you think you can wrap up? Your comments  
22 are very much appreciated.

23 MR. FENSEL: Okay. I'm trying not to beleaguer  
24 anything. Another thing that concerns us in Plymouth about  
25 this plan is that we realize that when Boston Edison reaches

1 the expected life of this plant and despite the fact that  
2 they would probably try to do the same thing that Yankee Rowe  
3 did and get their license extended; we hope that that doesn't  
4 happen.

5 I hope that the town of Plymouth has some input on  
6 any license applications, I don't think that we do. But  
7 whether or not Edison continues, if I were to have it, I'd  
8 have you shut the plan down to 5 percent until a plan is in  
9 operation that you approve of. I would have it that Edison,  
10 as a good corporate neighbor, would come clean with the fact  
11 that it cited a questionable BWR reactor here in Plymouth and  
12 that they're long term goal would be to continue producing  
13 power, but with a new gas turbine or with a from the Bay of  
14 Fundy, now that the technology existfor super conductors.

15 Maybe we can bring in D.C. power from Canada. I  
16 don't know. I understand the need to save the transmission  
17 system and I understand the expense that's been gone through,  
18 but I would hope that eventually that we'll end up with a gas  
19 turbine here.

20 But that leaves us with a problem since, in the  
21 original presentation that Edison made to the town of  
22 Plymouth, we were assured that there would not be long term  
23 storage of on-site high level waste; it was going to be  
24 temporary. That's what the wording is in the prospectus in  
25 the town of Plymouth. Well, temporary is not five years,

1 it's not ten years, it's not fifteen. It represents a need  
2 for Plymouth to have a continuing evacuation plan long after  
3 the there is no longer a working plant there.

4 We are concerned -- what happens if Edison, in it's  
5 corporate intelligence, decides this is a losing financial  
6 proposition, closes down the plant and leaves the town of  
7 Plymouth with all of that high level radioactive waste?  
8 They're not paying for a radiological waste depository in  
9 Plymouth. They're not being taxed for that. It's under  
10 their license as an operating plant.

11 MR. ERICKSON: Could you just wrap up?

12 MR. FENSEL: One more thing, then I promise to wrap  
13 up. MR. ERICKSON: Thank you.

14 MR. FENSEL: It's just that, you know, it's very  
15 infrequent that we get this opportunity to speak to you.

16 MR. ERICKSON: I understand.

17 MR. FENSEL: The use of the direct torus vent. We  
18 know that you at the NRC allowed it as an improvement, there  
19 are no NRC regs that cover DTVs, but from a planning point of  
20 view, our evacuation plan does not take into effect a high  
21 wind day with an onshore wind and Edison -- not the NRC  
22 on-site inspector, not NRC in Washington -- but BECo deciding  
23 that to save the containment or for the sake of safety of  
24 their equipment, that that DTV is going to need to be opened.

25 I would like assurance that not only that Doug

1 Hadfield is consulted with and asked whether it's all right,  
2 but that the NRC inspector and that our town is prepared;  
3 that this plan is drawn up with some, for some fast break  
4 accident if the DTV would be activated prior to being  
5 notified. The other two things--

6 MR. ERICKSON: Please, sir. I must ask you--

7 MR. FENSEL: I'm sorry. The other two things that  
8 I wish you would really consider when you're evaluating what  
9 you've heard here tonight when you're going over these tapes  
10 is that the general citizen in the town of Plymouth needs to  
11 have, we need to have your backing and the state's civil  
12 defense and some real education program that when those vents  
13 go off, they do not make the mistake of getting in their cars  
14 and jamming our roads. That the understand that the first  
15 thing is shelter; the second thing would be evacuation;  
16 because it would destroy our plan if our roads got clogged  
17 uninformed people.

18 There has not be a concentrated information program  
19 done to make sure that the citizen knows that the first  
20 course of action is to go inside, turn on your radio, close  
21 your windows and listen for instructions.

22 And the last thing, the last thing, sir, is that  
23 everyone of us that lives in this town would have every one  
24 of you visit us this coming Fourth of July and try to get out  
25 of this town after the fireworks. To understand, to



1 understand, sir, that we have a limited number of routes out  
2 of this town. And the only really effective ones in the plan  
3 are those that go north and northwest, and possibly west. If  
4 you can call 44 an effective route.

5 But when you understand that that's only a 90  
6 degree segment of a 360 degree wheel; the other 90 degrees is  
7 southwest and south toward the cape, which conveniently does  
8 not fit into the ten mile EPZ.

9 The people on the cape, when they hear Plymouth is  
10 evacuating, are going to take to the cars and head to the  
11 bridges. The situation at the Bourne rotary is going to be a  
12 zoo. Southbound on Route 3 is going to be inaccessible. And  
13 unless you people keep that in your mind and speak for' us,  
14 if you have to, to the commission on this airport siting.  
15 The reason why Plymouth was picked for a location for Boston  
16 Edison's power was to get it away from the Boston  
17 Metropolitan area and their airport. We are facing the very  
18 real possibility that some bureaucratic faux pas may locate a  
19 major Eastern Massachusetts airport in Plymouth.

20 MR. ERICKSON: Now we really are moving afield,  
21 you know.

22 MR. FENSEL: It's part of the evacuation plan,  
23 sir. I would appreciate it if the NRC would speak to the FAA  
24 and say please exclude Plymouth from airport planning.

25 Thank you very much for your time.



1 [Applause.]

2 MR. ERICKSON: Is Ann Waitkus-Arnold around,  
3 please?

4 MS. WAITKUS-ARNOLD: My name is Ann Waitkus-Arnold.  
5 I'm the director of Citizens At Risk, chairman of the town  
6 commission on handicapped affairs, chairman of the Plymouth  
7 nuclear affairs committee, and chairman of the statewide  
8 advisory board on evacuation planning for special needs of  
9 the office of the handicapped affairs.

10 I'm here tonight speaking for Citizens At Risk  
11 only. I came with this big speech again to talk about  
12 special needs, but really after all these years I think it's  
13 really pretty useless. I really think the agencies involved  
14 have been just deaf and blind to the needs of people who need  
15 assistance, although recently I have met some people who work  
16 in the NRC who I think I think are very, very decent  
17 individuals.

18 I would like to address your NRCs, I think it's Mr.  
19 Eaton's comments, that the NRC has a keen interest in Pilgrim  
20 Station. Of course they do. The NRC continues to take good  
21 care of their utilities and protect them at any cost to the  
22 public. It doesn't seem to matter that there is no way to  
23 evacuate the population and it doesn't seem to matter that  
24 people downwind have been sick and dying for years.

25 This cat and mouse game of meetings, reports and

1 public comments continues for years. It's a game that you  
2 play with us just to keep people busy while Pilgrim Station  
3 keeps rolling on. While more and more of our friends and  
4 neighbors, including children, continue to be stricken with  
5 leukemia, thyroid cancer and brain cancers.

6 The calls keep coming into our office, more  
7 children with leukemia and other cancers, more funerals to  
8 attend -- and it's not easy. More families to help cope with  
9 losing a loved one. Families devastated from Pilgrim  
10 Station. And the NRC is ultimately responsible.

11 Now we're left with FEMA. The Federal Emergency  
12 Management Agency. We have our Boston director, Jack Dolan,  
13 then we have the regional director, Dick "Crash" Strong.  
14 Dick likes to be called "Crash" by his friends. That  
15 doesn't give us a lot of security, sense of security. Dick  
16 was a friend of John Sununu's. Finally, we have Wally  
17 Fickney, the new federal director of FEMA. He worked for EPA  
18 and department of transportation in New Hampshire. Wally's  
19 also a friend of Mr. Sununu; but he has no experience in  
20 emergency planning.

21 Between the NRC's advocacy of nuclear power and  
22 FEMA's incompetence, this is just no more than a prescription  
23 for disaster for people living at Pilgrim Station. I don't  
24 feel that tonight's testimony, or any other -- my testimony  
25 or any other testimony will make any difference in providing

1 for the safety for people around Pilgrim Station. It's been  
2 too many years. 15 that I have counted.

3 We do feel that Boston Edison and all of the  
4 agencies who are responsible for public safety, but don't  
5 have the guts to say it won't work, should be held criminally  
6 liable for all of the harm done to citizens of this country.

7 Thank you.

8 [Applause.]

9 MR. ERICKSON: I would like to ask Jane Fleming to  
10 please come to the microphone.

11 That's fine, Jane. Yes, any of them will work.

12 MS. FLEMING: That's a hint.

13 MR. ERICKSON: I wonder, is that significant?

14 MS. FLEMING: I don't know. She's changing the  
15 paper. I dropped my Pepsi. I think we're here.

16 I have excused my friends. They can leave, go get  
17 a drink, have dinner, take a shower, come back; I'll still be  
18 here.

19 You guys have to stay. Too bad!

20 MR. ERICKSON: Now, Jane, you can cut short some of  
21 that by simply laying the paper on us, too. So if you could  
22 distill --

23 MS. FLEMING: No, Bob, this is the last opportunity  
24 that the public gets to speak before the public. Needless to  
25 say, you'll hear from me privately, but this is the last

1 opportunity to deal with the Task Force findings publicly,  
2 and I'm certainly sure that we should say it all.

3 MR. ERICKSON: Let me, just for the record, state  
4 that the Task Force has been very much engaged with Jane  
5 Fleming. In fact, there have been eight references in our  
6 report that I've noted, at least eight formal references to  
7 her communications and interactions with Jane Fleming and  
8 dozens, literally dozens and dozens of telephone calls, and  
9 the entire Task Force met for a full day on January 30th, and  
10 we have a complete transcript of that meeting, which has been  
11 made public along with everything else over at the Plymouth  
12 Public Library.

13 So that was with the full Task Force for at least  
14 six hours of transcription, which is all a matter of public  
15 record, and those of you who may wish to read it are  
16 certainly encouraged to do so.

17 So I think that we've had a good deal of  
18 interaction with Ms. Fleming. And now, however, it's your  
19 chance to speak again.

20 Jane Fleming.

21 MS. FLEMING: You certainly have, Bob, as you've  
22 indicated, and with all of that conversation, interaction  
23 beyond that, hundreds of pages of documentation, I still have  
24 a lot more to say. There's a lot more work to be done.

25 I am, for the record, Jane Fleming, if anyone

1 hasn't gathered that yet. I am a Duxbury citizen, a member  
2 and Acting Chairman of the Radiological Emergency Planning  
3 Study Committee, and as always, I am addressing you as a  
4 mother of two, and I want emergency planning.

5 Before we begin, I would like to acknowledge Ed's  
6 absence, and through you, I would like to express my sympathy  
7 to him.

8 First, I want to commend the members of the Task  
9 Force for the amount of work and effort that you have put  
10 into your job. You have identified and acknowledged the  
11 myriad of planning problems. Some of the problems are the  
12 ones that we have been trying for years to get anyone to  
13 acknowledge, and we are grateful finally to have them  
14 acknowledged.

15 Others, such as the Transportation Officers being  
16 part of the National Guard's job, came as a shock to those of  
17 us who thought we knew more than we ever wanted to know about  
18 emergency planning.

19 I appreciate how extensive a task it was to muck  
20 through four years of botched planning and the political  
21 coverups that went with it.

22 With this finding as a starting point and with the  
23 additional corrections and information you are receiving  
24 tonight, I am hopeful that you will be able to present an  
25 accurate and comprehensive final report to the Commission.

1 With such a final draft, particularly since it will be  
2 coupled with the State's new and improved attitude on the  
3 issue, we finally have a chance to achieve realistic  
4 emergency planning.

5 However, our chance, our hope, will only become a  
6 reality if you successfully complete your task by  
7 recommending that the Commission set the 120-day clock as  
8 provided by 10 CFR 50.47(s)(2).

9 This is not, as some in the room wish and some in  
10 this room fear, a request to shut down Pilgrim. Rather, it  
11 is a realistic assessment of the attitudes of all the key  
12 players, and it rests on the reality that they will achieve  
13 realistic planning only if the NRC applies its only truly  
14 effective tool available to it.

15 In this State, we have a new Administration, and  
16 thank God for that on many levels. But on this issue in  
17 particular, this Governor certainly cannot be classified as  
18 anti-nuclear, and with his legal background, we can be  
19 assured that he not only wants, but will insist upon  
20 emergency planning that comports with 10 CFR 50.47. From an  
21 economic standpoint, it is obvious that the Governor does not  
22 want a major power plant to be closed.

23 In the public safety department, Jim Roche has  
24 already set the tone. Planning is a top priority. The  
25 Public Safety Staff -- Bill is here tonight -- has been very



1 cooperative and more than eager to learn this new world of  
2 planning. I am confident this attitude will prevail.

3 MCDA's new Director, Dave Rodham, has been  
4 aggressively addressing the problems of planning. He is  
5 aware of the political hotseat he is in, and he is aware and  
6 is dealing openly and effectively with the fact that he has  
7 inherited the agency that is responsible for the lack of  
8 planning we currently have. He is making great strides  
9 forward, and his somewhat reluctant staff is now starting to  
10 follow his lead. There his hope, folks!

11 On the Hill, Beacon Hill, we have Representative Al  
12 Herran, who is Chairman of the Joint Legislative Committee.  
13 Cary is here tonight representing him.

14 He is currently putting together a comprehensive  
15 bill that will properly assess the utilities for the cost of  
16 emergency planning. In reality, it is nothing more than  
17 another cost of doing business.

18 The bill directs the funds to the appropriate state  
19 agencies. This bill, 1906, has bipartisan support, which is  
20 no easy trick in the Massachusetts Legislature these days.

21 In short, the pieces and the players are all in  
22 place, with one exception. Everyone is singing from the same  
23 book. The sole exception, the only one player left to get in  
24 line, is BECo.

25 BECo claims and has spent million on planning.

1 Unfortunately, it did so with a payoff mentality, rather than  
2 an honest effort to achieve any valid end results. BECo has  
3 lied, misrepresented facts, threatened opponents, bullied or  
4 cajoled half the world in an attempt to be the new messiah  
5 and falsely claim that planning is in place.

6 History is clear. BECo will do absolutely nothing  
7 to protect the public unless its back is flat against the  
8 wall. You have the power, and it is your responsibility to  
9 put BECo's back to that wall. You can force BECo to sing  
10 from the correct hymn book. You can make BECo join in the  
11 new state effort and put planning in place for the first time  
12 since 1987.

13 You, the NRC, and FEMA -- not BECo -- are charged  
14 with the responsibility of protecting us, the public.  
15 Recommend that the Commission invoke 10 CFR 50.47(s)(2) and  
16 set the 120-day clock. The responsible agencies will do  
17 their job.

18 For a little of the history, which I'll skip a lot  
19 of, in August '87, FEMA determined that offsite emergency  
20 preparedness had deteriorated to such an extent that FEMA  
21 could no longer make a finding that the state and local  
22 planning were adequate. Thus FEMA bit the bullet, as I am  
23 asking you to do. And it rescinded the '82 finding of  
24 adequacy.

25 The NRC Staff judged at the time that the

1 deficiencies identified in that FEMA report were significant.  
2 The NRC decided the plant would not be permitted to restart  
3 until it demonstrated improvements had been made in emergency  
4 plans. That's when the fun began.

5 The history of that, through the IG's reports and  
6 all, we all are familiar with. I won't run through that.

7 Since early April '89, Pilgrim has been operating  
8 in violation of 10 CFR 50.47, as I have stated to the NRC so  
9 often. The recent Task Force findings clearly support that  
10 position.

11 In 1988, the NRC Staff presented misinformation.  
12 The Commission made an incorrect decision based on that  
13 misinformation.

14 Today, two and one-half years after the plant was  
15 permitted to restart, the same key issue in the 1987 FEMA  
16 report -- transportation, reception center to the north,  
17 planning for schools, special needs -- are still in dispute.

18 I will discuss particular issues in a moment. But  
19 first, let's take an overview look at the Task Force.

20 The Task Force is the end result of the lessons  
21 learned from the IG's report, July 1990. On September 24th,  
22 James Taylor, the EDO, forwarded the charter for the Task  
23 Force to the Commission. The charter set forth five specific  
24 tasks:

25 Identify Pilgrim's offsite issues in dispute.

1 Determine the factual status of the issues in  
2 dispute.

3 Describe the current status of offsite EP for  
4 Pilgrim.

5 Identify and assess the significance of existing EP  
6 problems.

7 And recommend whether the NRC should reconsider  
8 it's reasonable assurance finding.

9 By and large, the Task Force took the charter  
10 instructions seriously. There are, to be sure, some  
11 particular problems remaining, but the Task Force did  
12 identify many critical issues, fairly describe most of the  
13 current status, and assess the significance of most of the  
14 still remaining problems.

15 Indeed, in identifying and assessing the  
16 significance of the current emergency planning problems, the  
17 Task Force correctly and unequivocally concluded that two  
18 particular problems precluded a finding of reasonable  
19 assurance.

20 The existing emergency plans state that the  
21 Massachusetts National Guard is to provide transportation  
22 officers and staff to the Wellesley Reception Center. After  
23 reviewing all of the facts, the original determination made  
24 by the Task Force was: Because the National Guard would not  
25 arrive at the Wellesley Reception Center for four to eight

1 hours after notification, the twelve-hour monitoring  
2 evaluation criteria, J.12, and the protective measures  
3 planning standard 10 CFR 50.47(b)(10), would not have been  
4 met.

5 Had this determination made its way to the final  
6 version in the report, the Task Force would have had not  
7 choice but to recommend that the Commission set the 120-day  
8 clock.

9 That result, however, was avoided by a ninth -- no  
10 actually a tenth -- inning rally by none other than BECo.

11 The events that followed the Task Force's original  
12 determination are now an issue of concern. What happened can  
13 only be called the "quick fix." Quickly defined, the "quick  
14 fix" was, BECo prematurely became aware of the original  
15 determination, and BECo, out of the goodness of its heart,  
16 offered to unilaterally resolve the underlying problems by  
17 usurping the State's authority in planning and placed a few  
18 of its own employees in positions which can only result in a  
19 clear and direct conflict of interest.

20 And the NRC and FEMA nod their consent, accept the  
21 unacceptable, and avoid having to face up to the facts  
22 underlying the initial determination.

23 The details of the quick fix will be discussed at  
24 the appropriate times throughout this testimony. However,  
25 the seriousness of the problem is such that it is necessary

1 to at least raise the important questions now.

2 Number one, was the utility given advance warning  
3 of the Task Force's initial findings, and if so, by whom?

4 Two, on what basis did the utility usurp the  
5 State's authority?

6 Three, how can BECo employees monitor evacuees at  
7 the Wellesley Reception Center without creating a clear  
8 conflict of interest?

9 Four, why did not the Task Force recognize that the  
10 level of staffing provided by the quick fix is totally  
11 inadequate.

12 Five, did the Task Force delay issuing its draft  
13 report to permit BECo to accomplish the quick fix?

14 Six, did the NRC and FEMA accept or even encourage  
15 the quick fix to accommodate BECo and avoid having to set the  
16 120-day clock?

17 Hopefully these questions will be resolved  
18 satisfactorily by the Task Force, but they will in any event  
19 be sent on to the IG's of both the NRC and FEMA. Protection  
20 of my family is far too important to lose to a BECo quick  
21 fix.

22 Now to get on with the other issues that are still  
23 in dispute, I have focused my attention on three issues --  
24 only three of them tonight, not all of them, folks: the  
25 Wellesley Reception Center to the north, transportation, and



1 the Duxbury schools.

2 The Wellesley Relocation Center. In its findings,  
3 the Task Force determined that the issues pertaining to the  
4 relocation center fall into two broad categories: facilities  
5 and equipment and staffing.

6 Excuse me [drinking]. It's a class act. Never  
7 trust a diabetic long without a drink.

8 Staffing is a key word so far as the Wellesley  
9 Relocation Center is concerned. The National Guard has  
10 repeatedly made clear that planning should proceed on the  
11 basis that the Guard will require a twelve-hour response  
12 time. Because of this, Wellesley does not meet the standards  
13 for a functioning relocation center.

14 The first evacuees will arrive about eleven and a  
15 half hours, if I'm driving, before the National Guard, and  
16 the Guard cannot possibly monitor all the evacuees in the 30  
17 minutes they will have remaining after they arrive.

18 Over the past few years, I have identified the  
19 obvious problem of the National Guard response time to all  
20 the responsible parties. I hand-delivered this information  
21 to Chairman Carr of the NRC on October 12, 1989, the day of  
22 the recent almost full-scale training exercise.

23 In the exercise itself on that date, the NRC, MCDA,  
24 and BECo covered up the response time problem by giving the  
25 Guard several days -- not hours, several days advance notice

1 -- that they were to report to Wellesley on the morning of  
2 the 12th. All of the responsible authorities were aware of  
3 this.

4 Yet FEMA's assessment of the exercise failed to  
5 identify the deficiency.

6 Why? The answer seems simple. And admission that  
7 the Wellesley Relocation Center would be completely unable to  
8 monitor evacuees in the prescribed time, twelve hours, at  
9 least without several days of advanced notice, would have  
10 precluded the NRC from making its critical finding of  
11 reasonable assurance.

12 This time, the Task Force listened to,  
13 acknowledged, identified, and assessed the significance of  
14 this deficiency. In this respect, they fulfilled the  
15 requirements of their charter. And if you had stopped there,  
16 you would have been heros today.

17 They would have done their job, and the results of  
18 their finding would have given BECo the 120 days to correct  
19 the situation, or shut down.

20 But in the tradition of the NRC, just doing your  
21 job and honestly protecting public health and safety is never  
22 the top priority. The top priority, as always, is to protect  
23 the industry -- never shut it down.

24 Thus we have the quick fix. Just let BECo say  
25 they'll do the job.

1           BECo will not fill the void and handle monitoring  
2   and other staffing positions assigned to the National Guard,  
3   our knights in shining armor -- BECo, led by King Ralph, with  
4   the help of some MCDA workers from Fort Devens, which is  
5   about to close, and with a few DPW workers from Arlington.  
6   The quick fix appeared as a last desperate attempt on the  
7   part of BECo to avoid Part V of the Task Force charter,  
8   "Recommend whether the NRC Should Reconsider Its Reasonable  
9   Assurance Findings." And if there is no reasonable  
10  assurance, to set the 120-day clock.

11           By the end of April, the Task Force had basically  
12  completed its review, had found that the National Guard  
13  staffing of the Wellesley Relocation Center did not meet the  
14  federal regulatory requirements. To avoid setting the clock,  
15  the Task Force seemed to have delayed issuing its already  
16  completed report, told BECo whatever it was unwilling to tell  
17  us, the public, and then gave itself and BECo the extra time  
18  to find this obviously inadequate quick fix.

19           What are the articular problems with the quick  
20  fix?

21           The first quick fix problem: Usurping the State's  
22  responsibility.

23           Planning, as we all know, as all of you should  
24  know, is the responsibility of the state and local  
25  authorities. The new Director of MCDA, Dave Rodham, not only

1 appears to be extremely competent; he has displayed a  
2 willingness to do his job properly. Indeed, Mr. Rodham has  
3 recognized the significance of the National Guard's staffing  
4 problem and has been working on a realistic solution to the  
5 deficiency. He has identified approximately 85 professionals  
6 with radiation backgrounds and is now in the process of  
7 getting them onboard under an agreement to fill the vacancies  
8 the National Guard cannot handle in a timely manner.

9 But to avoid setting the 120-day clock, the NRC and  
10 BECo pushed aside a reasonable and acceptable resolution that  
11 had already been proposed, and both then and currently is in  
12 progress at MCDA. By doing so, they simply usurped the  
13 authority of the State.

14 The State wanted time to put in place a workable  
15 plan that would protect its citizens. Neither BECo nor the  
16 NRC was willing to permit the State to do this. Letting the  
17 State provide something that might work might mean setting  
18 the clock, and if the clock was set, fixing the problems  
19 would finally become a priority. That would be a welcome  
20 change, since BECo certainly has never made fixing the  
21 problem a significant priority in the past.

22 The second quick fix problem: Conflict of  
23 interest.

24 The United States Court of Appeals defined a  
25 conflict of interest in 463 F.2nd 600, 602, a "situation in

1 which the regard for one duty leads to the disregard of  
2 another. The concept refers to the clash between public  
3 interest and private finances of an individual."

4 It doesn't take a Harvard law degree to quickly  
5 understand the conflict here. Every BECo employee will know  
6 that every person he monitors and he finds contaminated is a  
7 potential lawsuit against BECo. Every BECo employee will  
8 know also that an honest monitoring job may well mean the end  
9 of Pilgrim I and of his job. There is no double check to  
10 provide any assurance of accuracy and honesty in monitoring.  
11 A total of two men are assigned to the three monitors i  
12 Wellesley.

13 The conflict of interest is clear, and the result  
14 is a very real danger that contaminated citizens will not be  
15 identified and will not be decontaminated. The cancer will  
16 show up later.

17 The third quick fix problem: Inadequate staffing  
18 at Wellesley.

19 BECo and the Task Force would like us to believe  
20 that they can replace 50 trained and disciplined military  
21 personnel by giving two training sessions to the twenty BECo  
22 employees, 16 DPW workers from Arlington, and if it hasn't  
23 closed yet, the four MCDA employees from Fort Devens. Had  
24 Stormin' Norman known about this, I'm sure he could have  
25 ended the Desert Storm in less than twelve hours. Had we

1 told Saddam about the BECo boys coming and sent him Pilgrim's  
2 track record, we could have stopped the whole war without  
3 ever dropping a bomb. Incompetence is far more frightening  
4 than a smart missile.

5 Let's compare what the BECo boys -- you already  
6 heard the line, Pixie -- let's compare what the BECo boys  
7 with their two training sessions will be doing to the jobs  
8 that had been assigned to the National Guard. I have a whole  
9 list here comparing the things for the sake of the people.  
10 You can read the list and compare.

11 What does it mean, without me going through the  
12 list?

13 The most obvious problem is the portal monitor  
14 operators. Portal monitor operators, the National Guard had  
15 four; BECo has two. They're twice as good as the Guard.

16 We finally got the long-fought third monitor, so  
17 that if that monitor got -- if monitoring got started at a  
18 reasonable time, it could be completed within the prescribed  
19 twelve hours. But now we don't have an operator. Another  
20 example of BECo's planning expertise.

21 BECo finally provided the third monitor. One would  
22 have thought that whoever at BECo planned the quick fix would  
23 have remembered and provided the third operator.

24 More important, each portal monitor really should  
25 have two operators, particularly in view of the conflict of



1 interest issue. So we're short four men, not only one.

2 The so-called initial monitors, which are really  
3 the secondary monitors, they are the hand-held monitors that  
4 follow the two or three portal monitors. They're supposed to  
5 locate the particular area of contamination on people who  
6 have set off the alarms of the portal monitors. By the way,  
7 BECo sets the alarms about once a year. That's a little more  
8 confidence we can have.

9 The hand-held monitors are very time-consuming. At  
10 a minimum, there should be two initial monitors for each of  
11 the two or three portal monitors, not two total. Now we're  
12 down two to four initial monitors and four more men.

13 I should also point out that at some time these two  
14 initial monitors, the two men standing with hand-held  
15 monitors behind the three portal monitors will have to run  
16 across the room every now and then, and they are solely in  
17 charge of monitoring handicapped people, babies, anyone who  
18 is unable to go through a portal monitor. At the bare  
19 minimum, two more initial monitors and trained people to  
20 operate them are needed.

21 The personnel recorders are supposed to take down  
22 all the personal information that is required to ensure  
23 family reunification. We have two recorders assigned to the  
24 portal monitors, one more assigned to the handicapped. The  
25 flow will be anything but rapid. And don't forget, all of

1 this work must be done within the twelve-hour time.

2 Interestingly enough, BECo has assigned not one or  
3 two, but ten people, one-third of their total number of  
4 available personnel, to do vehicle monitoring, although no  
5 vehicle will be decontaminated until after the National Guard  
6 gets there. They'll monitor it, but they're not going to  
7 clean those cars.

8 The priority of cars over people is interesting, to  
9 say the least, and it makes one wonder what the BECo boys  
10 have been trained to do. Maybe they do work overtime for a  
11 car wash.

12 No radio operator. This one is truly amazing.  
13 It's amazing how much time you people -- the NRC in general,  
14 FEMA -- discuss the importance of communication. And then  
15 you accept a quick fix that doesn't even include a radio  
16 operator during the early and most crucial parts of the  
17 accident, no radio operator until the National Guard finally  
18 gets there.

19 Communication was an integral part of the entire  
20 evacuation planning process. Without a radio operator,  
21 anyone that Wellesley was supposed to communicate with now  
22 has a communication deficiency.

23 Even more amazing to all of us is that we are to  
24 believe that BECo and their friends, who are fully trained in  
25 two quick fix training sessions, May 14th and 16th, in just a

1 few short hours, they didn't just learn one job they were  
2 supposed to do; they learned everything there is to know  
3 about jobs at a relocation center, any job. They can  
4 monitor, they can register, they can decontaminate anything,  
5 be it a car, a mother, a baby, or a quadraplegic.

6 Is there any need to say it? The quick fix is a  
7 disaster.

8 All we are asking is that you do your job. State  
9 as you did initially in the draft report that the monitoring  
10 and evaluation criterion, J.12, and the protective measure  
11 planning standard, 10 CFR 50.47(b)(10), have not been met,  
12 and say so unequivocally.

13 I could have gotten a glass; it would have been  
14 politer.

15 It is a very easy statement to make. I've been  
16 saying it since April of 1989. The NRC, FEMA, and BECo --  
17 you are all in violation of NUREG 0654 and 10 CFR 50.47 by  
18 allowing Pilgrim to operate at above 5 percent power without  
19 emergency planning in place. The quick fix isn't a fix at  
20 all.

21 The list of problems with Wellesley Relocation  
22 Center goes on beyond the quick fix. First, the question of  
23 whether or not you people think you need -- think you need -  
24 - an LOA to ensure the cooperation of the Red Cross, even  
25 though the guidelines of NUREG 0654 are clear that all

1 support groups must sign an agreement or signature page, the  
2 real issue is identified: The Red Cross congregate care  
3 centers don't exist. They don't know of their existence.

4 And also the other issue identified: The Red Cross  
5 in the past has stated it won't participate in your man-made  
6 disaster. Those were the issues you should have checked.

7 The statement in the draft report that the third  
8 monitor is needed only in the case that one of the other  
9 breaks is not quite accurate, just using the time estimates  
10 that you chose, similar to the one that Chairman Carr chose  
11 by chance, the third is needed to perform monitoring within  
12 the prescribed time. It's not a backup. It is necessary to  
13 monitor the population from Duxbury and Marshfield, the 20  
14 percent population that will be arriving.

15 FEMA's guideline for sending contaminated injured  
16 to nearby hospitals would be fine if the transportation were  
17 provided, which it isn't, and if we had enough hospitals to  
18 handle the volume. Collectively, and using the numbers that  
19 you have accepted, thirteen hospitals can handle 39 people in  
20 twelve hours. There are over 900 special needs people that  
21 have been identified.

22 Chances are if any one person becomes contaminated,  
23 many will be. A plume does not selectively seek out only one  
24 or two people. It will cover a vast area and everyone in it.  
25 Thirty-nine people in twelve hours is just the beginning.

1 Relocation centers, like all things in planning --  
2 you're changing my drink [laughing]; I like my Pepsi. It's  
3 nice to have a helping hand here.

4 The relocation center, like all things -- oh, no,  
5 Bob, I'm not stopping -- like all things in planning, must  
6 conform to common sense. Reading all your and BECo's  
7 justification of ridiculous planning scenarios brings Clare  
8 Donahue to mind again. Clare would have listened and read  
9 through all the foolishness and would have brought it right  
10 back down to reality with her now immortal quote: "And who  
11 will bring the towels?" Clare, there are still no towels.

12 Buses -- Aby, Blair -- buses; are we ready?

13 On the issue of transportation, I will say ad  
14 libbing -- oh, God, now she's going to ad lib! -- Aby and  
15 Blair did an overwhelming amount of work when they took on  
16 the transportation. They did work. They spent hours on it.  
17 They did identify many, many problems. They did do basically  
18 a very good job, still not perfect.

19 And I'm here to tell you where the mistakes came  
20 in.

21 On the issue of transportation, I will identify  
22 four major problem areas that either (a) have not been  
23 adequately identified by the Task Force, or although  
24 identified, the resolution is not quite what it should be.

25 The are first of all the BECo transportation



1 officers; secondly, the essentially exclusive use of BECo  
2 information; third, the insufficient numbers of buses  
3 available; and fourth, the new format letters of agreement,  
4 LOAs.

5 Under BECo transportation officers, this was  
6 another critical part of the quick fix. In its draft report,  
7 the Task Force said that "another area of transportation that  
8 had to be corrected in order to ensure that a prompt  
9 evacuation could be performed, if necessary, was that the  
10 response time for the transportation officers staffing, the  
11 Area II emergency operation, had to be shortened so that it  
12 could -- so that they could promptly assess transportation  
13 needs and notify providers." That's their sentence -- whew!  
14 I talk a lot, but that's one heck of a sentence!

15 And that "because of the delays associated with  
16 its response time, the National Guard was not suitable to  
17 fill the Area II transportation positions."

18 Rather than facing the issue squarely, the Task  
19 Force again turned and bowed to its friends at BECo. As this  
20 report said: "This aspect of overall transportation has been  
21 satisfactorily addressed by the temporary assignment and  
22 training of staff from BECo to replace the National Guard  
23 personnel."

24 Satisfactory, I may ask, to whom?

25 The Task Force draft report is strangely silent



1 about this training. It may have been part of the two  
2 training sessions for the Wellesley Relocation Center  
3 personnel, but the transportation officers are nowhere  
4 mentioned or listed, although they are stationed at the  
5 Wellesley Center.

6           Probably more important, BECo says that these  
7 temporary personnel will only be available for four to six  
8 months -- four months, 120 days. Does it ring a bell?

9           Without the impetus of the 120-day clock, on what  
10 basis should we expect that fully trained, real replacements  
11 will be available then or ever? This probably is the most  
12 blatant example of the Task Force expressly finding that  
13 existing plans utterly fail to provide reasonable assurance  
14 that the NRC's own regulations require, and then looking for  
15 a quick and cheap way to let BECo off the 120-day hook.

16           Part II, essentially exclusive use of BECo  
17 information.

18           In explaining the procedure to be used by the Task  
19 Force, Chairman Carr characterized BECo's input into the  
20 process as that of a strawman. In other words, the job of  
21 the Task Force was to compare the information given to it by  
22 BECo with independent information from reliable sources.

23           The Task Force spent endless hours examining  
24 problems that existed with transportation providers, chiefly  
25 buses. They carefully examined the information provided by

1 BECo and MCDA and determined that there were a great many  
2 inconsistencies between the two.

3 This, by itself, is a finding of considerable  
4 interest. BECo developed both sets of information, as the  
5 Task Force was informed repeatedly on January 30, 1991.

6 The fact that BECo was the source of both its own  
7 and MCDA's data means that the strawman was compared only to  
8 itself. The discrepancies thus prove only one thing. BECo's  
9 planners are not very good or even very consistent in their  
10 misinformation.

11 On the other hand, the draft report is clear that  
12 the Task Force did not address the discrepancies between  
13 vehicle assignment in the town procedures and the Area II  
14 transportation group IP. That translated means that the Task  
15 Force didn't look at the transportation needs that the towns  
16 identified and compared what the towns said to what BECo said  
17 in its work and MCDA's.

18 In short, perhaps unwittingly, at least until the  
19 situation was called to your attention in late January, the  
20 Task Force effectively ignored Chairman Carr's admonition  
21 that the job was to compare what BECo said with independent,  
22 reliable information. Once again, the NRC relied exclusively  
23 on the utility's assessments of needs, rather than going to  
24 the towns to determine what their needs actually were.

25 Had the Task Force addressed the discrepancies

1 between town procedures and the Area II transportation group  
2 IPs, BECo's work, I am sure they would have identified many  
3 critical glitches in the BECo information.

4 Take, for example, Duxbury's school special  
5 transportation needs. According to Dr. James Lyng, Duxbury's  
6 Director of Special Education, and Patricia Monahan, Plymouth  
7 Area Collaborative, a program for the severely handicapped  
8 ranging from nine months to adult, the Duxbury schools will  
9 need for Alden Upper and Lower one lift van. That was  
10 correct on the information. For Chandler School, the  
11 integrated kindergarten program six vans or station wagons  
12 with seatbelts. For the Duxbury Intermediate School for the  
13 PAC students, one lift van for the two wheelchair students.  
14 I believe that was correctly identified. For Duxbury High  
15 School's Magic Dragon Program, ranging six weeks to five  
16 years, six vans or wagons with car seats. I think all of us  
17 can agree a six-week-old cannot be thrown on the big yellow  
18 school bus.

19 The Task Force draft report, by comparison, left  
20 out Chandler and the High School Magic Dragon Program.

21 Until the Task Force addresses these discrepancies  
22 between vehicle assignments in the town procedures, or even  
23 better, discusses the needs with the town's responsible  
24 personnel -- and I would suggest for any of the town members  
25 that are here, have your personnel check to see what it says,

1 because these could be fixed, if you take the time to check  
2 them -- there will be no accurate count of what the  
3 vehicles really require. The strawman-to-strawman comparison  
4 that has been made means that once again the people that will  
5 be hurt or left behind are the children, the handicapped, and  
6 the elderly.

7           Insufficient number of buses, unacceptable LOAs.  
8 Lone before this Task Force held its first meeting here in  
9 Plymouth, I told the NRC time and time again: There are not  
10 enough buses to successfully evacuate the children, let alone  
11 the others who are transportation-dependent. This statement  
12 is still true today.

13           The Task Force determined that 361 buses are needed  
14 to evacuate the school children, and another 140 buses,  
15 making a total of 501, are required to evacuate the entire  
16 EPZ transportation-dependent population. The Task Force  
17 draft report says that 518 buses are available. Reality is  
18 that at the present time, the maximum number of buses that  
19 can be counted on is only 298. This translates into a  
20 shortfall of all together 203 buses, 63 for the schools  
21 alone, and no buses will be there for the rest who require  
22 them.

23           The principal reasons for the chasm between the  
24 draft report and the real world are -- I won't go through  
25 them all; I'll give you a few examples:

1           Barnstable. It's assigned four buses assigned to  
2   nursery schools: Busy Bee -- if you hear your child's school  
3   called, this is like the game, you will have a Crispy Critter  
4   at the end of this -- Busy Bee, Kiddy Kollege, Tiny Town, and  
5   Kinder Haus. They have buses coming from Barnstable.

6           Jack, I didn't excuse you.

7           [Laughter.]

8           Okay, I'll still be here, Jack.

9           The problem with this company -- Jack hates  
10   transportation issues. I've been trying to identify the LOAs  
11   to Jack for three years. Three years ago last February, Jack  
12   walked out of his office on me as I tried to show him the  
13   LOAs.

14          VOICE: He didn't.

15          MS. FLEMING: History does repeat itself. Ah,  
16   trust FEMA!

17          The problem with Barnstable is obviously that it's  
18   a Cape Cod company. The plans call for the Sagamore Bridge  
19   to be closed and only one lane of the Bourne Bridge to be  
20   open. Under those conditions, traffic will be gridlocked for  
21   hours. They keep telling me, but -- but -- it's for the  
22   special vehicles we've opened the lane. They'll never get to  
23   the bridge. They forget, it's not just the bridge; it's the  
24   whole Cape.

25          For example, on the Tuesday following Memorial Day

1 -- and Memorial Day was light on the Cape, and this was the  
2 day after the weekend -- there was a 17-mile backup, and both  
3 bridges were open and operating.

4           Some of the other companies that I have problems  
5 with, and there are many -- not many, but there are some here  
6 -- C.S. Phillips. The problem with that is a reverse LOA.  
7 I've spoken to Aby about this problem. What happened in this  
8 circumstance is, Marshfield wrote a letter to C.A. Phillips  
9 saying: We need twelve buses. They're calling that a  
10 reverse LOA. I call it a request. There is no written  
11 response. They maybe have requested, and Aby assures me that  
12 Phillips' intent is to come, but they have not signed. Right  
13 now today, there is no contract signed with C.A. Phillips.  
14 it must be there. The letter of agreement has to be there to  
15 make it count. Intent is great, but it just doesn't work.

16           Reliable has ten buses assigned.

17           Pardon me? No, no. That's the new format, Bob. I  
18 checked, Bob. I check and I doublecheck and I triplecheck my  
19 information.

20           The new format LOA is there.

21           VOICE: Even in the old format, Jane, I went  
22 through that again after we talked.

23           MS. FLEMING: Did you fine one?

24           VOICE: There is a signature by Mr. Phillips on the  
25 LOA, on the datasheet, that substantiates as strongly as



1 other LOAs.

2 MS. FLEMING: There is one that has been -- what's  
3 the date of that one?

4 VOICE: I don't recall it. I don't have it in  
5 front of me. But there is a signature by Phillips on the  
6 datasheet.

7 MS. FLEMING: Whose signature?

8 VOICE: Mr. Phillips'.

9 MS. FLEMING: Okay. And has it -- we're not  
10 discussing the new LOA format.

11 VOICE: I don't want to engage -- I just want to -  
12 - some of these points, I think, you know --

13 MS. FLEMING: All right. Other major problems  
14 without going through all of them is, many of the bus  
15 companies -- Reliable, Mederios, Tremblay -- they are -- they  
16 have stated on their LOAs, there will be a three-hour  
17 mobilization time. That's three hours before they start to  
18 move.

19 Then they all being from New Bedford and Fairhaven  
20 have about an hour or an hour and a half to get here. That  
21 equals a total estimated time of arrival before they get  
22 here.

23 If we had enough buses already for the schools, and  
24 they were just going to the TSAs, the staging areas, maybe  
25 that would be acceptable. But there aren't enough buses yet

1 for the schools. So every bus coming into town will be  
2 pressed into service to evacuate schools.

3 It just -- it doesn't work. We're short. We're  
4 short 63 buses for schools alone, 201.

5 The Task Force assessment essentially ignores many  
6 of the buses it is counting -- in the case of the buses  
7 coming -- four and a half hours. Fine. If an accident  
8 happens at Boston Edison, at Pilgrim, between 7:00 and 10:00  
9 in the morning. If an accident happens after 10:00 in the  
10 morning, the kids are sitting in school for four and a half  
11 hours waiting for their bus to come by, they go home. School  
12 is out at 2:30.

13 It's over, folks! What are you talking about?  
14 Evacuating schools with a bus that won't come for four and a  
15 half hours. They don't care if there's an accident. When  
16 school's out, the kids will go home.

17 The next, new format LOA. Although it never  
18 reviewed the new LOA format, the Task Force -- that's on page  
19 2-131 of your draft report -- the Task Force somehow came up  
20 with the conclusion that the new format would ensure  
21 uniformity and clarify of commitment. Had they reviewed the  
22 new format, the Task Force would have reached quite a  
23 different conclusion.

24 The new LOAs seriously diminish the effectiveness  
25 of evacuation planning. Their effect is to delay evacuation

1 by at least three hours and to add a new "smoke-and-mirrors"  
2 quality to the transportation provider issue.

3 Section II.A.3, NUREG 0654, requires that "each  
4 plan shall include written agreements between federal, state,  
5 and local agencies and other support organizations having  
6 emergencies -- emergency response role within Emergency  
7 Planning Zones." That section applies to many issues in  
8 planning that hasn't quite been done. But written agreements  
9 -- written agreements.

10 The new formats of all the LOAs mean that they are  
11 not agreements at all. Rather, they are nothing more than  
12 what is normally called a letter of intent. A letter of  
13 intent is not an agreement or a contract, but as the courts  
14 have so often observed, it is simply an expression of the  
15 tentative intentions of the parties.

16 In addition, the content of the new format is such  
17 that it cannot possibly act as an effective agreement.  
18 Unlike the old LOAs, there is no longer anything to indicate,  
19 or more important to commit to, the numbers of drivers  
20 expected to be available.

21 Without committing to drivers, the new format can  
22 provide no assurance that an adequate number of buses will  
23 arrive. The Task Force noted that many of the old LOAs did  
24 not provide an adequate number of drivers. The Task Force  
25 properly eliminated any buses without drivers from its

1 calculations.

2 BECo did not solve the no drivers problem by simply  
3 eliminating both firm commitments and necessary information.

4 The information on how many drivers that BECo's new format  
5 manages to hide must be considered in assessing the extent to  
6 which the problem exists.

7 Those of us who live in the EPZ -- Bob, I am  
8 certainly sure that in the last public meeting on this issue,  
9 an issue that we have all been concerned about for so many  
10 years, you don't want to shut off the public, and the public  
11 -- I have given my permission to leave; you people, I  
12 haven't.

13 [Laughter.]

14 Those of us who live in the EPZ aren't reasonably  
15 assured by an expression of tentative intentions. Our fear  
16 that there will not be an adequate number of buses is not  
17 dispelled by a new format that forgets BECo has not yet  
18 advanced technology to the point that buses will come without  
19 drivers.

20 The new format also allows all buses to use three  
21 hours even to mobilize. This helps BECo with numbers, but  
22 delays actual evacuation from three to five hours. A NeSHP  
23 report on evacuation times stated that within a ten-mile EPZ  
24 -- this one's an important one to hear; I'll clue them when  
25 it's important -- decreasing evacuation delay time from five

1 to zero hours will decrease whole-body radiation doses,  
2 decrease the chance of being contaminated by an approximate  
3 factor of 75 times.

4 The new format increases delay time by three to  
5 five hours. Thus it increases our chances of contamination  
6 by about the same factor, 75 times.

7 The new format, as the Task Force noted, ensured  
8 uniformity and clarity of commitments, but because of it, the  
9 entire process is moving backward rather than improving.

10 On Wednesday, January 30, 1991, I identified the  
11 problem of the new LOA format to the Task Force. In  
12 response, the Task Force assured me that they would find the  
13 answers, because they could ask the person who wrote it.  
14 Then later they said, okay, we will find out.

15 Did they find out? The unfortunate answer is no.  
16 Instead, the NRC decided not to deal with the issue. They  
17 turned it over to FEMA. Jack Dolan of FEMA was at the  
18 January meeting during this discussion, and true to form,  
19 FEMA has yet to address the issue.

20 From three years of experience, as I've mentioned,  
21 Jack does not like to deal with transportation problems.

22 The one thing that the new format does reasonably  
23 assure is that real efforts to address our transportation  
24 needs will be greatly diminished. Delayed evacuation time  
25 will increase, and no one will have any idea how many buses

1 will really arrive, because they don't know how many drivers  
2 are committed by each company.

3 We can be assured that a bus without a driver will  
4 not arrive. The new format is simply not acceptable.

5 I ask the Task Force to again look at this problem,  
6 assess it nonestly, and insist that the State -- I have  
7 already spoken to Dave Rodham of MCDA about this -- and BECo  
8 use a format that will provide real contracts, not letters of  
9 intent, that require real buses with real drivers to arrive  
10 in the EPZ to effectively evacuate our people.

11 For you people, I'm now going on to schools.  
12 Planning for the Duxbury schools is still plagued with  
13 problems. The majority are created by mistakes in the Area  
14 II planning by a failure to integrate Area II plans with  
15 local plans.

16 The statement that "no man is an island" is  
17 particularly pertinent when applied to planning. It is not  
18 enough for each individual to do his own job to ensure that  
19 the small section for which he is responsible reflects the  
20 outstanding needs for that particular portion of overall  
21 plans.

22 Real success comes only when all of the codependent  
23 individual aspects are examined, and that the necessary  
24 dovetailing of integration is then accomplished, so that all  
25 the different pieces can be brought together.



1           Here, many of the individual plans have not been  
2 properly developed, and very few of the individual pieces  
3 have been fit together.

4           The lack of monitoring, perhaps the most critical  
5 shortcoming of the schools, is the lack of any plan for  
6 effective monitoring.

7           NUREG 0654, J.12, provides in pertinent part:  
8 "Each organization shall describe the means for registering  
9 and monitoring of evacuees at relocation centers in host  
10 areas. The personnel and equipment should be capable of  
11 monitoring within about a twelve-hour period all residents  
12 and transients in the plume exposure EPZ arriving at  
13 relocation centers."

14           In the draft report, the Task Force finds the  
15 concept of monitoring school children at reception centers,  
16 relocation centers, acceptable. I concept, I agree. But  
17 once again, the centers, the so-called host schools, have no  
18 monitoring capabilities. It would be difficult to imagine a  
19 more unique and clear violation of the just cited NUREG  
20 provision.

21           As an aside, I should note that contrary to what is  
22 said in the Task Force draft report the idea of host schools  
23 for the school population was not an option first presented  
24 or developed by the State. Rather it was another of BECo's  
25 ideas: Let's keep numbers down at the reception centers; to

1 hell with the kids!

2 Let's dispel some of the myths that BECo has  
3 presented to justify this blatant violation of the NUREG  
4 monitoring requirement.

5 Precautionary transfer of school children. BECo  
6 has attempted to convince the world that the children will be  
7 moved out before any release occurs. As might be expected,  
8 there are a number of flaws in this BECo thinking.

9 As I have already discussed, there are not enough  
10 buses to evacuate the entire school population, and the new  
11 LOA format allows, and in many cases actually creates, a  
12 three to five-hour delay time before any evacuation will even  
13 begin. Yet according to NUREG 0654, a release from Pilgrim  
14 could occur from zero to 30 minutes.

15 If the children leave the schools and pass through  
16 a radioactive plume while riding on one of the supposed  
17 buses, the buses will be contacted by radio and told to go to  
18 Wellesley.

19 Given the length of time it will take to get the  
20 children on the buses in the first place, the likelihood of  
21 the buses passing through a plume is far greater than it  
22 should be. If they do, it is not a laughing matter. The  
23 buses offer less than a 1 percent dose reduction, meaning  
24 that they might as well be standing out in the open.

25 What is worth at least a chuckle is BECo's apparent

1 confidence4 that the buses will be contacted. During the  
2 only recent almost-full-scale exercise in October of 1989,  
3 the town of Duxbury lost all communication with the buses  
4 very early in the game.

5 Since neither FEMA nor the NRC acknowledge this  
6 failure in the FEMA report reviewing the exercise, there is  
7 no way of knowing if the communication void has been or will  
8 be corrected.

9 By the way, William Russell of the NRC was in  
10 Duxbury's EOC during the time the entire EOC was trying to  
11 find the buses. Bill neither noticed nor reported this  
12 problem, although the buses weren't official "found" until  
13 the next day.

14 MR. ERICKSON: We really do need to wrap up.

15 MS. FLEMING: Bob, we really do need emergency  
16 planning for our children.

17 MR. ERICKSON: Certainly, of course

18 MS. FLEMING: So let's get our priorities straight.  
19 This is more important than a good night's sleep.

20 MR. ERICKSON: It isn't a matter of sleeping.

21 MS. FLEMING: That is what it's a matter of.

22 MR. ERICKSON: It isn't a matter of a good night's  
23 sleep for me; it's a matter of what is the most efficient way  
24 of providing the comments that you wish to provide to us  
25 tonight.

1 MS. FLEMING: No, I think it's a matter of -- Bob,  
2 as I said --

3 MR. ERICKSON: That is not the important thing at  
4 this juncture.

5 MS. FLEMING: Maybe if we stop discussing it and I  
6 finish giving my oral presentation, then maybe we can wrap  
7 up, okay?

8 MR. ERICKSON: Please, Jane, please try to  
9 complete it in the next five minutes, if you would.

10 MS. FLEMING: I'll try.

11 MR. ERICKSON: Thank you.

12 MS. FLEMING: If the children have been  
13 contaminated, they will be sent to Wellesley to be monitored.

14  
15 Let's think of it this way, too, Bob. A little  
16 aside.

17 If you had done your job perfectly, right, all I'd  
18 have to say here tonight is: Hey, great job, guys. Thank you  
19 very much. You did a wonderful job.

20 But unfortunately the job wasn't done perfectly,  
21 and my children are still at risk.

22 Therefore, for the 40th time, to illustrate, I will  
23 go through this. If you think you're bored, I have repeated  
24 this information millions of times.

25 MR. ERICKSON: It's not a matter of being bored,

1 Jane. It's a matter of --

2 MS. FLEMING: Then pay attention, Bob.

3 If the children have been contaminated, they will  
4 be sent to Wellesley to be monitored.

5 Here again, there is a wide variance between  
6 reality and the BECo "truth". Again, as I have already  
7 discussed, Wellesley simply does not have the capability to  
8 monitor the school population with the prescribed twelve-  
9 hour time. The reception center can't even handle the non-  
10 school population within that time period.

11 The new suggestion that school monitoring will be  
12 solved by providing some "express line" ignores, one, that  
13 there aren't monitors to use in such a line and, two, that  
14 the quick fix doesn't provide any people to operate the  
15 express monitor, even if one should be found, and three, that  
16 monitoring Duxbury's students and staff will take ten hours,  
17 not including the Marshfield students and staff, who will be  
18 in the same express line.

19 As an aside, this is probably an appropriate time  
20 to raise a related question: Given the obvious length of  
21 time it would take to monitor children in Wellesley, even if  
22 Wellesley had monitoring capabilities, why does the plan  
23 bother with separate host schools student relocation centers  
24 at all?

25 The "take the children to the Needham host school

1 after they're monitored in Wellesley" concept will result in  
2 chaos. parents will be arriving at Needham to find their  
3 children are still at Wellesley. Then with their pre- or  
4 post-school children, they'll arrive at Wellesley,  
5 overloading a system that already is not equipped to handle  
6 the minimum population percentage -- 20 percent --  
7 requirements. This can only result in bedlam, foreseeable to  
8 all.

9 On whom can we pin the blame? BECo, MCDA, the  
10 State, FEMA, or the NRC? They all know. They are all aware.  
11 And the have all been personally informed.  
12 Maybe we should get out our legal shotguns and go after them  
13 all.

14 MR. ERICKSON: May I interrupt a moment, please?  
15 Just a moment.

16 What I'd like to do at this point is discontinue  
17 the transcription. We'll listen to your comments, and  
18 you'll be able to then also provide us with a copy of your  
19 statement.

20 MS. FLEMING: That is your choice. I don't find  
21 it acceptable.

22 MR. ERICKSON: Will you be able to wrap up  
23 shortly, Jane?

24 MS. FLEMING: I'll try, Bob.

25 MR. ERICKSON: Please, please try.



1 MS. FLEMING: Can this flaw be fixed? Yes, it can.

2 On June 3, 1991, the Duxbury School Committee voted  
3 -- and I will give you a copy of their vote -- that in the  
4 event of a radiological accident at Pilgrim Nuclear Power  
5 Station, all Duxbury students and staff relocated from  
6 Duxbury to Needham, the current relocation center for Duxbury  
7 students, will be monitored by portal monitors at the Needham  
8 Relocation Center, also sometimes referred to as the host  
9 school.

10 The School Committee also voted that Boston Edison  
11 Company provide two portal monitors to be kept at the Needham  
12 High School or at any other host school that may hereafter be  
13 designated for Duxbury students or staff; that the  
14 Massachusetts Civil Defense Agency assign and train the  
15 appropriate personnel in a number sufficient to operate the  
16 portal monitors at the host school; and that all appropriate  
17 IPs be corrected and redrafted, as required, to reflect and  
18 provide that the Duxbury school population will be monitored  
19 at the host school relocation sites.

20 As a hidden bonus, these two additional monitors  
21 could also be used to monitor parents and siblings who arrive  
22 in Needham to pick up their children and provide some needed  
23 relief to the overloaded monitoring system in Wellesley.

24 I discussed this "monitor the school children in  
25 Needham" procedure with Chairman Carr, and his response to it

1 was favorable. Dave Rodham of MCDA has told me that to  
2 monitor the school children at the Needham host school was  
3 feasible and realistic and has given his word that he will  
4 put the procedure in place.

5 If the Task Force will face up to the inadequacy of  
6 the present plan and support the relatively simple solution,  
7 this is one area in which reasonable assurance may actually  
8 be provided.

9 There are other problems for the Duxbury schools.  
10 Unfortunately the current lack of monitoring plans or  
11 facilities is not the only problem with the proposed  
12 emergency planning for the Duxbury public schools.

13 For example, hand-held monitors. BECo has not  
14 delivered the hand-held monitors it promised the School  
15 Superintendent. Among other things, these are needed to back  
16 up portal monitors in Needham.

17 Training of teachers: Less than 50 percent of the  
18 teachers have been trained. Perhaps this is an indication  
19 that the teachers meant it when, in response to a poll, they  
20 said that they would not participate.

21 Interim assignment of transportation officers: This  
22 is another part of the quick fix. As has been noted in a  
23 letter that the School Committee submitted to the Task Force:  
24 "The committee is seriously concerned with the proposed  
25 interim assignment of BECo personnel and employees as Area II

1 transportation officers. Trained transportation officers are  
2 essential to the successful evacuation of the Duxbury school  
3 population. We do not believe that this critical need is met  
4 by BECo volunteers on an interim basis, and not for more than  
5 a four to six-month period. We request that whatever  
6 personnel are required be assigned on a permanent basis."

7           Dose reduction: As the School Committee said, a  
8 dose reduction study should be performed on each school  
9 building that has been designated as an emergency shelter.  
10 In the event of a fast-breaking accident, current plans call  
11 for sheltering, not evacuating, the school children.

12           A dose reduction study is necessary, one, to  
13 provide guidance to those who must decide whether to shelter  
14 or evacuate and, two, if sheltering is the choice, to permit  
15 the Duxbury school staff to move the student body to the  
16 areas of each building that offer the greatest sheltering  
17 factor.

18           The new LOA format: The new format, which the Task  
19 Force did not review, severely diminishes the level of  
20 effective evacuation planning for the schools. The extended  
21 mobilization time delays evacuation to such an extent that  
22 the concept or precautionary transfer of school children is a  
23 joke.

24           Misrepresentations of host schools: The Task Force  
25 draft report refers somewhat obliquely to the fact that just

1 before the October 1989 exercise, it was discovered that BECO  
2 had misrepresented to the NRC that Framingham and Newton were  
3 the host schools for Duxbury.

4 The Task Force treatment of this is another  
5 interesting example of its habit of relying on BECO for  
6 factual information and avoiding public statements  
7 embarrassing to BECO. The fact is, BECO lied to the State,  
8 to Duxbury, to FEMA, and to the NRC.

9 Did you, the Task Force, identify this violation of  
10 Title 18, Section 1001 to Mr. James Taylor, the EDO, as you  
11 were supposed to?

12 Camp Squanto: Dr. Kennedy and the Task Force again  
13 missed the point. This is not a training problem. It is a  
14 problem in planning.

15 The children to which the Task Force draft report  
16 refers, including my son, fell through the cracks because  
17 BECO's planners, as they admitted in their October 4, 1990  
18 response to the NRC, could not comprehend that schools and  
19 camps might run simultaneously. Under BECO's plans, when  
20 schools are open, camp IPs will not be activated.

21 The reverse is also true, as was apparent in  
22 Duxbury last summer when the schools were not notified of an  
23 unusual event. BECO planners have not yet figured out that  
24 all schools and all camps must be notified any time that  
25 emergency planning is activated.

1 Remember, as NRC officials have taught me over the  
2 last four years: Planning is simply get them out and get  
3 them out monitored! Those two key issues have not yet been  
4 satisfactorily resolved for Duxbury's school children.

5 What can the Task Force do? Recommend setting the  
6 120-day clock, so the State will have the time and BECo will  
7 have the real incentive to fix the problems.

8 I thank you very much for your time.

9 The only thing I would like to add to illustrate is  
10 the fact that I hope the delay of the quick fix doesn't  
11 result in the fact that this whole process goes before the  
12 Commission for hearing after the Chairman leaves office.

13 If that is the case, that is a crime. Chairman  
14 Carr and I have worked together on these problems for four  
15 years. We started our relationship as adversaries. We are  
16 still some percent of the time adversaries. But through our  
17 relationship, I've learned a great deal of respect for him as  
18 a man and for his position. I don't always like his  
19 decisions, but I oftentimes understand why he has made them.

20 In this particular case, the chairman has more  
21 knowledge on this issue than actually any of you, even after  
22 all the work you've done. He knows it, understands it, and  
23 he will make an informed decision.

24 And of all the things the quick fix did, delaying  
25 this and having this decision go on until after the chairman

1 is gone would be the biggest crime.

2 Thank you.

3 [Applause.]

4 MR. ERICKSON: Thank you, Jane.

5 We had one more speaker from BECo, but given the  
6 time, he has declined. We will acknowledge that he is here  
7 and thank him for his interest.

8 And considering, then, that there are no further  
9 speakers, we will conclude the proceedings at this time.

10 Thank you very much.

11 [Whereupon, at 11:20 o'clock, p.m., the proceedings  
12 were concluded.]

13

14

15

16

17

18

19

20

21

22

23

24

25



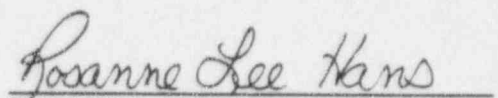
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

COMMONWEALTH OF MASSACHUSETTS  
COUNTY OF PLYMOUTH

I, ROSANNE LEE HANS, Notary Public duly  
commissioned and qualified in and for the Commonwealth of  
Massachusetts, do hereby certify that there came before me  
on the 12th day of June, 1991, the people hereinbefore  
named; and do hereby certify that this transcript of the  
hearing is a true record.

IN WITNESS WHEREOF, I have hereunto set my  
hand and affixed my seal this 13th day of June, 1991.

  
\_\_\_\_\_  
ROSANNE LEE HANS,  
Notary Public

My commission expires:  
January 25, 1996